



Child Protection & Safeguarding Policy

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Signed:  Dated: 16/10/2025
Chair of Governors

Signed:  Dated: 16/10/2025
Principal

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1. Rationale

Goldington Academy is committed to the ongoing safeguarding and protection of children. Safeguarding is broader than child protection, and includes protecting children from maltreatment, preventing impairment of children's health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes. Students are informed about the importance of safeguarding through the overall ethos of mutual respect, curriculum areas such as Life Skills, RSE, Computing (e-safety), assemblies, partnerships with external agencies and through our commitment to promoting British Values and equality throughout our curriculum and in our everyday working practices. Our policy applies to all staff (including volunteers), visitors and governors working in the Academy.

It is essential that **everybody** working in a school or college understands their safeguarding responsibilities. Everyone who comes into contact with children and families has a role to play ensuring children and young people are safe from abuse, neglect, exploitation and harm. Our school is committed to safeguarding children and aims to create a culture of vigilance. All staff should make sure that any decisions made are **in the best interests of the child**.

2. Legal Frameworks and Guidance

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2025) and Working Together to Safeguard Children (2023), and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see section 3).

This policy is also based on the following legislation:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques
- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what ‘regulated activity’ is in relation to children
- Statutory guidance on the Prevent duty, which explains schools’ duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it’s proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there’s evidence that they’re being disproportionately subjected to sexual violence or harassment
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- Working together to Improve School Attendance – August 2024
- Children Missing Education Procedure – Bedford Borough

3. Policy aims and objectives

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children’s welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly training in recognising and reporting safeguarding issues

Goldington Academy will follow the procedures set out by the local safeguarding partners and have regard to statutory guidance issued by the Department for Education to achieve the following objectives:

- Ensuring there is a designated safeguarding lead (DSL), and Deputy DSL who have received appropriate training and support for this role. This person/s will provide support to staff members to carry out their safeguarding duties and will liaise closely with other services.
- Ensuring governors understand their role in appropriately monitoring safeguarding.

- Ensuring every member of staff, volunteer and governor knows the name of the DSL and Deputy DSL and their role.
- Giving appropriate information so that all staff and volunteers understand their responsibilities in relation to safeguarding.
- Giving appropriate information so that parents understand the trust's roles and responsibilities relating to safeguarding.
- Allocating resources to enable the academy to discharge its safeguarding responsibilities properly.
- Ensuring that all staff and volunteers are able to raise any concerns about poor or unsafe practice.
- Developing effective links with relevant agencies and co-operate as appropriate with their enquiries regarding child protection matters including attendance at case conferences.
- Keeping written records of concerns about children, even where there is no need to refer the matter immediately.
- Keeping all records securely, separate from the main pupil file, and in locked locations.
- Developing and then following procedures where an allegation is made against a member of staff or volunteer.
- Always following safer recruitment practices.
- Ensuring that staff are aware of the statutory guidance 'Keeping Children Safe in Education'

4. Useful Contacts

Designated Safeguarding Lead	Mr Will Atkinson	01234 261516 07711349611 atkinsonw@goldington.beds.sch.uk
Academy Principal	Mr Francis Galbraith	01234261516 07711349612 galbraithf@goldington.beds.sch.uk

Deputy Designated Safeguarding Lead/Designated teacher for Looked After Children	Mrs Anthea Jones	01234 261516 07711349614 jonesa@goldington.beds.sch.uk
Mental Health Lead	Mrs Alex Cassan	cassana@goldington.beds.sch.uk
Nominated Safeguarding Governor	Mr Neil Davies	davies n@goldington.beds.sch.uk
Integrated Front Door (Previously Multi Agency Safeguarding Hub (MASH))	Borough Hall, Bedford	01234 718700 (office hours) or 0300 300 8123 (out of hours).
NSPCC Helpline	NSPCC	0800 800 5000
Bedford Borough Local Area Designated Officer	Sandeep Mohan	LADO@Bedford.gov.uk Sandeep.Mohan@bedford.gov.uk 01234 276693
Bedfordshire Police		01234 841212/101 In emergency dial 999
Channel helpline (for Prevent/radicalisation concerns)		020 7340 7264

5. Definitions

In line with the law, this policy defines a child as anyone under the age of 18 years but in the case of SEND it is up to 25 years of age.

This policy applies to all members of staff in our school, including all permanent, temporary and support staff, governors, volunteers, contractors and external service or activity providers.

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment

- Preventing impairment of children’s mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care

Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children. This abuse can be emotional as well as physical.

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

Children includes everyone under the age of 18.

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

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

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

Definitions of specific types of abuse are detailed throughout this policy.

6. If a child is in immediate danger

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Make a referral to children's social care and/or the police **immediately** if a child is in immediate danger or at risk of harm. **Anyone can make a referral.**

- Tell the DSL/Deputy DSL as soon as possible if you make a referral directly
- Integrated Front Door (MASH) Bedford Borough: 01234 718700
- Integrated Front Door out of hours emergency number: 0300 300 8123
- Police/Emergency Services: 999
- Bedfordshire Police: 01234 841212

Other useful contacts can be found in [Appendix 4](#).

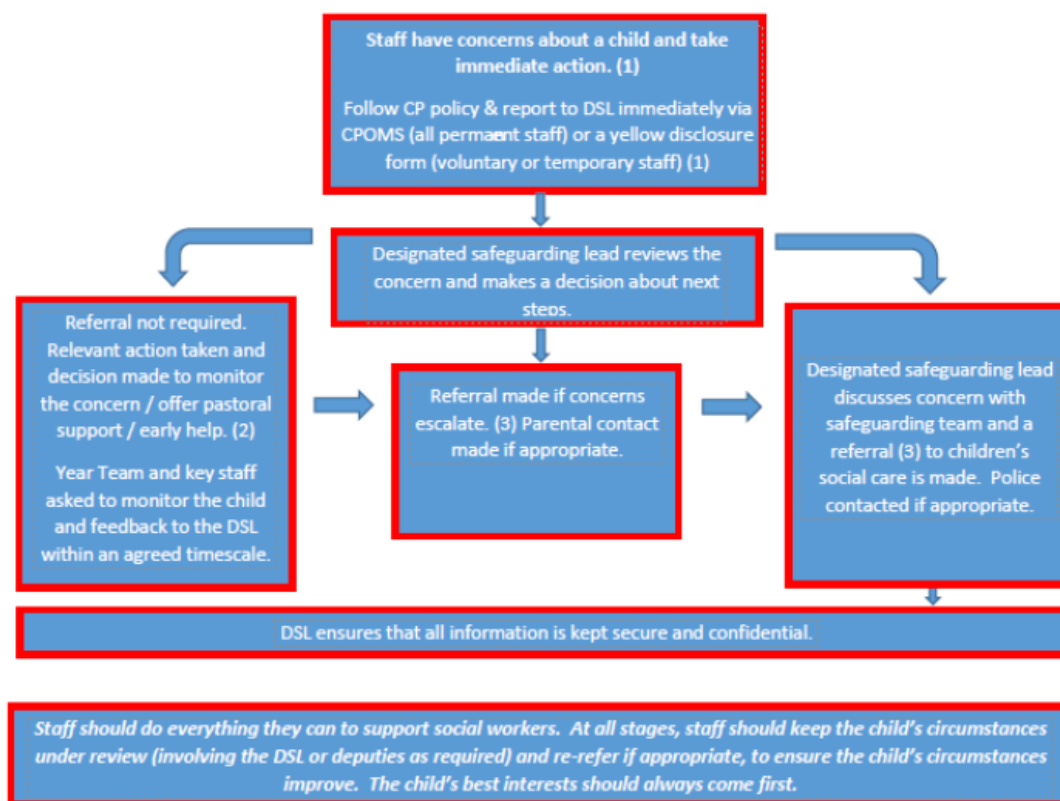
7. What to do when a child discloses information

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

- Not promise that you can keep their disclosure secret or that you can improve their current situation
- Listen to and believe them. Allow them time to talk freely and **do not** ask leading questions
 - A leading question implies or contains its own answer. It subtly prompts the respondent to answer in a particular way. Leading questions can lead a disclosure off track, prompting the respondent to answer in the way they think you want to hear or are comfortable with rather than what they want to share. Examples of leading questions are 'Who hit you?' 'Did your mommy do this to you?' 'Did it hurt when he hit you?'
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Tell them who you are going to tell and reassure them that not everyone will know. Do not promise to keep it a secret
- Record your conversation as soon as possible in the child's own words. Ensure the facts are reported. Professional opinion is important and should be identified as opinion in the record.

- Sign and date the write-up and pass it on to the DSL either via a pink slip or preferably via CPOMS. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so

7.1 Process Flow Chart



7.2 Female Genital Mutilation

If you discover that Female Genital Mutilation (FGM) has taken place or a pupil is at risk of FGM

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

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out later in this policy in the section entitled 'Female Genital Mutilation'.

Any teacher who discovers (either through disclosure by the victim or visual evidence, such as bleeding, discomfort when walking etc) that an act of FGM appears to have been carried out

on a **pupil under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

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

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

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

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures.

[Female Genital Mutilation - Prevent & Protect | NSPCC](#)

7.3 Extremism

If you have concerns about extremism

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

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

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

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

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

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

7.4 Mental Health

If you have a mental health concern

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

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by completing a CPOMS entry or pink slip as soon as possible and speaking the DSL/Deputy DSL and the school's mental health lead as soon as possible.

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

8. What to do if a child needs urgent medical attention

If a child needs urgent medical attention, staff should inform the first aid team immediately (located in Student Services) so that they can assess the need and take the next appropriate steps (please refer to the Medical Policy).

If it is believed that the injury is non-accidental and is the result of abuse, the DSL should be informed immediately and a written record of the concern should be made on CPOMS as soon as possible. The DSL will then decide on and take the next appropriate steps to safeguard the child/children.

In the event that the child/children are on a school trip, the trip leader should follow their risk assessments and any emergency plans.

9. Roles and responsibilities

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

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

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:

- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality
- Body confidence and self-esteem
- How to recognise an abusive relationship (including coercive and controlling behaviour)

The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support

What constitutes sexual harassment and sexual violence and why they're always unacceptable

10. All staff

All staff will be aware of:

All staff will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBT to speak out and share their concerns
- All staff will be aware of:
 - Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputy, the behaviour policy, the E Safety Policy and the safeguarding response to children who go missing from education
 - The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
 - The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
 - What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals

- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children
- What to look for to identify children who need help or protection

Later sections in this policy outline in more detail how staff are supported to do this.

11. The role of the Designated Safeguarding Lead (DSL)

The role of the DSL carries a significant level of responsibility and they should be given the time, funding, training, resources and support they need to carry out their role effectively. The DSL is a member of the senior leadership team. Our DSL is Will Atkinson and the deputy DSL is Anthea Jones. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

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

The DSL will:

- Provide advice and support to other staff on child welfare and child protection matters
 - Learning about/noticing and sharing child protection concerns can be upsetting for staff. The Principal/DSL and appropriate line manager will provide support for staff individually following their involvement with a child protection issue as appropriate. This may be internally or may be through an external source of support, such as Westfield Health.
- Ensure that all staff receive regular child protection training that is appropriate to their role.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school

- Ensure that concerns that a young person may be at risk of abuse are recorded on the young person's child protection record, along with a record of how the concerns have been dealt with.

The DSL will also:

- Keep the headteacher informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

12. The governing body

The governing board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a senior board level (or equivalent) lead link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
 - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
 - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
- Make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 2 sections 1 and 2 of this policy covers these procedures.
- That this policy reflects children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognized.
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
 - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
 - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
 - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply
- The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate.

The expectation is that governors will read Keeping Children Safe in Education in full and familiarise themselves with the annual updates.

12. The Academy Principal

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

- Ensuring that staff (including temporary staff) and volunteers:
 - Are informed of our systems which support safeguarding, including this policy, as part of their induction
 - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)

- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this.

Virtual school heads

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

They should also identify and engage with key professionals, e.g. DSLs, SENDCos, social workers, mental health leads etc.

Supervision

Goldington Academy is committed to ensuring adequate supervision for all staff. This supervision is a supportive measure to enable reflection/learning where appropriate and to quality assure the safeguarding practices within the school.

All staff will:

- receive group supervision through regular training
- receive individual supervision following the submission of a safeguarding referral where necessary – the DSL and DDSL view all safeguarding referrals made. This may be in relation to the quality of the written referral or to support the member of staff emotionally following a particularly distressing disclosure from a pupil.

Heads of Year/Pastoral staff/DDSL will:

- receive weekly group supervision through weekly pastoral meetings
- receive weekly individual supervision through meetings with the DSL/DDSL

DSL will:

- receive half termly supervision from the nominated safeguarding governor
- receive termly supervision from the Health and Safety Committee
- receive regular supervision from the Academy Principal – the Academy Principal has oversight of all safeguarding referrals and subsequent actions
- receive weekly peer supervision from the DDSL

13. Identifying abuse

Staff should always focus on what is in the best interests of the child. All staff at Goldington Academy should be prepared to identify children who may benefit from early help. This means providing support as soon as a problem emerges at any point in a child's life. Staff should discuss early help requirements with the DSL in the first instance. If early help is required, staff should liaise with external agencies and consider setting up an inter-agency assessment (usually completed by the pastoral team).

All academy staff should be aware of the signs of abuse and neglect. The descriptions below are taken from the DfE guidance 'Keeping children safe in education'. Additional guidance can be found in 'What to do if you're worried a child is being abused'.

All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

All academy staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. **All** academy staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. In most cases, multiple issues will overlap with one another. Staff should also be aware that behaviours linked to the likes of drug taking, alcohol abuse, truancy and sexting put children in danger.

Physical abuse

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

- Unexplained injuries or burns
- Untreated injuries
- Bruises/abrasion around the face
- Bi-lateral injuries e.g. two bruised eyes
- Bite marks
- Bruising abrasions to lips, cheeks, outer ear

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or

developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

It may involve seeing or hearing the ill-treatment of another. This can also occur when a child is a young carer for a parent who is disabled, has mental health problems or misuses alcohol or drugs. It may involve seeing or hearing, for example, fighting or violence in the home.

It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Indicators include:

- Excessive overreaction to mistakes
- Continual self-deprecation
- Self harm
- Excessive rocking, thumb sucking, hair twisting
- Extreme compliance/aggression
- Drug, alcohol and substance misuse
- Significant peer relationship difficulties

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for sexual abuse.

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

Indicators include:

- Sexual awareness inappropriate to child's age, including provocative sexual behaviour
- Self-harm
- Pregnancy
- Sexually transmitted diseases
- Sudden changes in behaviour or school performance
- Fear of undressing for gym

- Depression/withdrawal
- Drug, alcohol, substance abuse

Neglect

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

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment.

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

Indicators include:

- Constant hunger, tiredness, and/or poor personal hygiene
- Untreated medical problems
- Destructive tendencies
- Social isolation
- Poor self-esteem and/or relationship with peers
- Excessive rocking, hair twisting, thumb sucking

Mental health

All staff should also be aware that mental health problems can, in some cases, be a sign that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by completing a CPOMS entry or pink slip as soon as possible and speaking to the DSL/Deputy DSL and the school's mental health lead as soon as possible. If you have a mental health concern that is not also a safeguarding concern, speak to the DSL to agree a course of action.

To promote positive mental health, the school will:

- Appoint a mental health lead to act as the lead person in promoting and supporting good mental health in both students and staff
- Ensure staff receive mental health training/updates on at least an annual basis
- Run the Strength and Difficulties Questionnaire across the whole school on a termly basis (half termly for pupils identified as vulnerable) to identify those pupils at risk of suffering with poor mental health and those who need immediate support
- Continue to develop pastoral interventions aimed at developing GRIT and resilience in pupils
- Using restorative justice to resolve conflict and maintain a harmonious culture across the school
- Create good partnership working with available resources such as CAMH and the school nurse to support both pupils and staff in promoting and maintaining good mental health
- Use school based rewards systems such as positive written feedback, achievement points, shout outs, rewards evenings etc to develop good self-esteem amongst pupils
- Use pupil voice and the school council to ensure that pupils feel valued in school
- Promote and develop opportunities for pupil leadership in school through initiatives like subject ambassadors, anti-bullying ambassadors etc to increase pupil self esteem
- Promote good mental health through assemblies, tutor times, displays and other initiatives.

Promote good mental health through tangible sources of inspiration, e.g. Henry Fraser, Angela Duckworth and Jessica Cox.

Specific types of abuse

In addition to the above more general categories of abuse, there are several types of specific abuse that staff must be aware of. These specific types of abuse fall into, and often across, the wider categories of abuse listed above. Please see appendix 3 of this policy for information about and the potential signs and symptoms of the specific types of abuse listed below.

- Bullying
- Child Criminal Exploitation (CCE)
- Child Sexual Exploitation (CSE)
- Female Genital Mutilation
- Forced marriage
- So called 'honour-based' abuse (HBA)
- Breast ironing
- Radicalisation and Extremism
- Child on child abuse

- Sexting
- Upskirting
- Serious Violence
- Domestic abuse
- Homelessness

14. Equality statement for children at greater risk of abuse

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

- Children who may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Whose parent/carers has expressed an intention to remove them from school to be home educated
- Children with high levels of absence

We recognise that children with high levels of absence are particularly at risk to a wide range of safeguarding concerns, including sexual abuse, sexual or criminal exploitation.

Please see the Academy's Attendance Policy for information about attendance tracking and intervention.

➤ Children with Special Educational Needs and Disabilities

We recognise that pupils with special educational needs (SEND) or disabilities or certain health conditions can face additional safeguarding challenges, and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- We offer extra pastoral support for these pupils and any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENDCo.

➤ **Looked After Children and Previously Looked After Children**

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

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

We have appointed a designated teacher, Anthea Jones, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

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

As part of their role, the designated teacher will:

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

➤ **Private Fostering**

Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative'. This is a private arrangement made between a parent and a carer, where the intention is for it to last longer than 28 days. Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts.

Where the Academy becomes aware of a private fostering arrangement it must inform the Local Authority. The Academy does not need to wait for 28 days in order to do this.

Please refer to the Academy's *LAC and PLAC* policy for further information.

➤ **Young carers**

A young carer is someone under 18 who helps look after someone in their family, or a friend, who is ill, disabled or misuses drugs or alcohol.

Young carers might undertake activities in the home such as:

- Practical tasks, such as cooking, housework and shopping.
- Physical care, such as helping someone out of bed.
- Emotional support, such as talking to someone who is distressed.

- Personal care, such as helping someone dress.
- Managing the family budget and collecting prescriptions.
- Helping to give medicine.
- Helping someone communicate.
- Looking after brothers and sisters

Being a young carer can have a big impact on the things that are important to growing up, for example it can affect a young person's health, social life and self-confidence.

Many young carers struggle to juggle their education and caring which can cause pressure and stress. In a survey, 39% said that nobody in their school was aware of their caring role. 26% have been bullied at school because of their caring role. 1 in 20 miss school because of their caring role.

Staff should be aware who the young carers are in school. Potential indicators of need could be:

- Having poor school attendance or being regularly late
- Homework not submitted regularly
- Signs of neglect such as dirty clothes, no food at lunchtime etc
- Isolating themselves from friends/staff
- Signs of bullying

Staff should report any concerns about young carers by following normal safeguarding procedures.

➤ **English as an additional language (EAL)**

Students whose first language is not English are at particular risk of abuse as they cannot readily report it. Staff should be more vigilant with EAL children when looking for the physical and emotional signs of abuse.

Pupils who are new to English (proficiency code A) will be given targeted support in the first two weeks of them joining the school under the direction of the EAL co-ordinator. This will provide the opportunity to form a bond and communicate with a trusted adult.

Any concerns relating to EAL children should be reported via normal safeguarding procedures.

Goldington Academy also gives special consideration to recognises that children may face discrimination due to their race, ethnicity, religion, gender identification or sexuality.

➤ **Travellers**

Traveller children often spend large amounts of time out of school travelling and as a result spend less time with professionals and are more vulnerable to abuse. Traveller children often

leave school much earlier than non-traveller children and are at risk of not receiving a full-time education. This could result in low self-esteem, at risk of being NEET and poor outcomes.

➤ **Children with refugee status**

Refugee children in Britain are a diverse group. Some children may arrive in the UK with both parents; others may only have one parent caring for them. Some children may live with older brothers and sisters, or with relatives and friends. Other children arrive alone and unaccompanied, without a parent or carer. Often, children with refugee status do not speak English and may have SEN that are undiagnosed, which makes them particularly vulnerable.

Schools and early years providers play a vital role in promoting the wellbeing of refugee children, helping them to rebuild their self-esteem and friendships, and achieve with their learning. It is also important that schools look for signs of abuse such as forced marriage, FGM etc if children with refugee status come from countries where these practices are prevalent.

➤ **Children who have a family member in prison**

Having a parent or other family member in prison, can impact on a child's sense of identity and how they interact with their family and community. Equally importantly, it can impact on their lives at school. The majority of these children will have a father in prison, because the number of men in prison is far higher than the number of women.

Research has shown that parental imprisonment has a direct impact on children's academic attainment, socioemotional development and behaviour, often escalating to school exclusion or truancy (Social Care Institute for Excellence [SCIE], 2008). School support for children with a family member in prison, therefore, is important as it will contribute to improving a range of educational and wellbeing outcomes for a group of children who are at risk of a number of poorer outcomes.

➤ **Children subject to Child Protection/CIN plans or who have a social worker**

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

Pupils who are lesbian, gay, bisexual or gender questioning

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

15. E-safety

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

To address this, our school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

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

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism, misinformation, disinformation (including fake-news) and conspiracy theories
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

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

- Educate pupils about online safety as part of our curriculum. For example:
 - The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online
 - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and through National Online Safety. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
 - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

Please refer to the Academy's E-Safety Policy for further information.

Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini.

Goldington Academy recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

Goldington Academy will treat any use of AI to access harmful content or bully pupils in line with this policy and our anti-bullying/Behaviour policy.

Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the school. Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education.

16. Submitting a safeguarding concern

Safeguarding is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. Everyone who works with our pupils should make sure that their approach is child-centred, that is that they consider at all times what is in the best interests of the child.

Any concerns about pupils must be discussed with the relevant DSL (or Deputy in their absence) as soon as possible, and at latest by the end of the day. A safeguarding record of concern form (pink slip) [Appendix 1a+1b](#) or **preferably a CPOMS log** should be completed and submitted electronically to either the DSL or deputy DSL as soon as possible. Following the receipt of a safeguarding record of concern form (pink slip or CPOMS log), the DSL (or Deputy DSL in their absence) will decide whether to make a referral to children's social care.

In the absence of the DSL/Deputy DSL any member of staff can make a direct referral to children's social care, and if a child is in immediate danger or at risk of harm, a referral should be made to children's social care and/or the police immediately. Where a referral is made by someone other than the DSL, the DSL should be informed as soon as possible. If staff members have concerns about a child they must raise these with the academy DSL as a matter of urgency and provide him/her with a referral/concern form.

16.1 Following a referral to Children's social care

As a result of the assessment, children's services will decide one of the following:

- that the child is not 'In Need'. In this case, children's services will take no further action other than, where appropriate, to provide information and advice in accordance with the local Early Help Offer [Early Help for families | Bedford Borough Council](#).
- that the child is 'In Need', but it has been determined that the child is not suffering, or considered likely to suffer, significant harm. In this case, children's services will determine the support which will be provided and draw up a 'Child In Need' plan accordingly.
- that the child is 'In Need' and that there are concerns that the child is suffering, or considered likely to suffer, significant harm. In which case, children's services will initiate a strategy discussion to determine whether a Section 47 investigation is necessary; and consider whether any immediate protective action is also required.

Strategy Discussion

When children's services have reason to believe that a child is at risk of suffering or is likely to suffer significant harm, a strategy discussion is arranged. Children's services lead the discussion, which may include other agencies such as the police, health and education providers.

The aim of the meeting is to:

- share information between the agencies involved;
- decide what further steps should be taken to safeguard the child concerned, including any immediate action where appropriate;
- plan the Section 47 investigation (if one is to be undertaken), including the need for further information;
- determine when the child will be interviewed alone by the lead social worker (where appropriate given the age of the child); and
- determine what information from the Strategy Discussion will be shared with the family, unless such information sharing may place a child at increased risk of harm or jeopardise any criminal investigation.
- Parents and family will not be invited to participate or attend the strategy discussion.
- Either the school's DSL or Deputy DSL will attend strategy meetings.

Section 47 investigation

The local authority is required by section 47 of the Children Act 1989 to make inquiries and conduct investigations if there are reasonable grounds to suspect that a child is suffering or is

likely to suffer significant harm. The purpose of these inquiries is to determine whether the local authority needs to take any further action to promote or safeguard the child's welfare.

A child can be placed on a 'Child Protection Plan' if the outcome of the section 47 investigation has determined that the child is suffering, or is likely to suffer, significant harm.

16.2 Escalation procedures

Following a referral to Children's social services, if the school feels that any practitioner or agency is not acting in the best interests of the child then the DSL and the Academy Principal will follow the **Pan Bedfordshire Multi Agency Disagreement and Escalation procedure**.

[Escalation Procedures \(proceduresonline.com\)](http://proceduresonline.com)

17. Reporting systems for our pupils

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

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- There are numerous reporting systems for pupils, including one to one a trusted adult, a reporting tool on the school website, anti-bullying boxes in every form room, emails for all pupils and staff, peer reporting systems e.g. Anti-bullying ambassadors.
- These systems are made clear to pupils through assemblies and form time sessions.
- We will make it clear to pupils that their voice is paramount in the safeguarding process and their welfare is our priority.

18 Record-keeping

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

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will 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

Concerns and referrals will be kept in a separate child protection file for each child, either paper based or on CPOMS where possible.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

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

To allow the new school/college to have support in place when the child arrives, this should be within:

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

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Where possible, all child protection documentation will be held securely via CPOMS.

Adequate layers of access have been allocated to all staff to allow them to effectively access information necessary for effective safeguarding, but to also protect as much of a child and family's privacy as possible.

If the school receives paper based child protection records, these are stored in a locked cabinet in the DSL office. Only the DSL and deputy DSL have access to this cabinet.

19 Notifying parents or carers

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

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

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

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

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

Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed

Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

20 Information sharing

As part of meeting children's needs, governors and leaders recognise the importance of information sharing between professionals and local agencies. Further information can be found in Chapter one of Working Together to Safeguard Children, and in Information Sharing: Advice for practitioners. Concerns about sharing information cannot stand in the way of the need to promote the welfare and protect safety of children.

Information sharing decisions will be recorded on the relevant child protection file.

21 Confidentiality

At Goldington Academy we believe that:

The safety, well-being and protection of our pupils are the paramount consideration in all decisions staff at this school make about confidentiality. The appropriate sharing of information between school staff is an essential element in ensuring our pupils well-being and safety. It is an essential part of the ethos of our school that trust is established to enable pupils, staff and parents/carers to seek help both within and outside the school and minimise the number of situations when personal information is shared to ensure pupils, staff are supported and safe.

The school's attitude to confidentiality is open and easily understood and everyone should be able to trust the boundaries of confidentiality operating within the school. Everyone in the school community needs to know that no one can offer absolute confidentiality.

Parents/carers will have ready access to files and records of their own children, but information about other children/ originating outside the school will be redacted. Information about a child will be passed on to third parties only with the agreement of parents or after informing them that there is a legal obligation for the Academy to do so. For further information please see the Academy's Confidentiality Policy.

In addition, it must be noted that:

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

- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

22 Operation Encompass

The school participates in the Operation Encompass domestic abuse information sharing scheme with Bedfordshire Police. For more information, please visit the safeguarding page on the school website and see appendix 9 of this policy.

23 Staff Training

All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the 3 safeguarding partners.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

All staff will receive annual training on E safety, Mental health and anti-bullying.

Staff will also receive weekly safeguarding and child protection updates through weekly briefings and email updates as required.

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

Volunteers will receive appropriate training, if applicable.

All staff are required to read Part 1 of the Keeping Children Safe in Education Guidance and sign to say they have done so and understood their role/responsibilities.

The DSL and deputy DSL

The DSL and deputy DSL will undergo child protection training every two years.

In addition, they will receive additional updates to their formal training at regular intervals to keep up to date with any developments relevant to their role.

They will also undertake Prevent awareness training.

Senior and middle Leaders

Senior and middle leaders who are involved in interview panels will undergo safer recruitment training in line with the Department for Education's statutory guidance, Keeping Children Safe in Education, and local safeguarding procedures.

Governors

All governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

24 Positive Handling

The Education Act 1996 (2002) forbids corporal punishment, but allows all teachers to use reasonable force. We have a commitment to ensure the safety of our pupils and staff at all times. In some rare situations this may require the use of force to physically restrain pupils. The use of restraint must be necessary and reasonable in the context of the event. Section 93 of the Education and Inspections Act 2006 enables schools to use reasonable force to restrain pupils when they are:

- Committing a criminal offence
- Causing personal injury to themselves or another
- Causing damage to property belonging to them or another, including the school
- Behaving in a manner that is prejudicing the maintenance of good order and discipline in the school

If positive handling has been necessary, members of staff must inform the Academy Principal and the DSL by completing the *Form For Recording an Incident* [Appendix 4](#) within 24 hours of the positive handling and submitting it to the Academy Principal.

Please refer to the Academy's Positive Handling Policy for further information.

25 Complaints and concerns about school safeguarding policies

Complaints against staff

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

Whistleblowing

If you have concerns regarding the way the school safeguards pupils, including poor or unsafe practice, or potential failures, please refer to the Whistleblowing Policy for further direction.

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

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

The headteacher/chair of governors will then follow the procedures set out in **Appendix 2**, if appropriate.

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

27 Low level concerns

A low-level concern is any concern that an adult has acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- doesn't meet the threshold of harm or is not considered serious enough for the school or college to refer to the local authority.

Low-level concerns are part of a spectrum of behaviour. This includes:

- inadvertent or thoughtless behaviour
- behaviour that might be considered inappropriate depending on the circumstances
- behaviour which is intended to enable abuse.

Examples of such behaviour could include:

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

Please refer to Appendix 2 section 2 of this policy for further information and guidance on how to report the concern.

28 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils. Even when there are no specific reports/allegations of child-on-child abuse, we recognise that this form of abuse may still be taking place and will assume that it is.

We also recognise the gendered nature of child on child abuse, with girls more likely to be victims of child-on-child sexual abuse. However, all child on child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school’s behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

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

Procedures for dealing with allegations of child on child abuse

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will refer to the Academy’s offer of Early Help to support the victim/perpetrator
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

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

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Ensure staff are trained to understand:
 - How to recognise the indicators and signs of child on child abuse, and know how to identify it and respond to reports
 - That even if there are no reports of child on child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
 - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child’s behaviour might indicate that something is wrong
 - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
 - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
 - The important role they have to play in preventing child on child abuse and responding where they believe a child may be at risk from it
 - That they should speak to the DSL if they have any concerns

Sharing of nudes and semi-nudes (‘sexting’)

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as ‘sexting’ or ‘youth produced sexual imagery’), you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it

- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

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

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

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

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the

police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

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

They will hold interviews with the pupils involved (if appropriate).

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

Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done by the DSL.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in this policy also apply to recording these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation
- Pupils also learn the strategies and skills needed to manage:
 - Specific requests or pressure to provide (or forward) such images
 - The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

29 Safer recruitments

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

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

Advertising

When advertising roles, we will make clear:

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

Application forms

Our application forms will:

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

Shortlisting

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

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

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

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
 - If they have a criminal history
 - Whether they are included on the barred list
 - Whether they are prohibited from teaching
 - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
 - Any relevant overseas information – Goldington Academy will carry out an overseas check if the candidate has been abroad for 3 months or more in the last five years at the date of application. This may require applicants to provide a certificate of good conduct, or similar, from the country which they resided. More information can be found at [Guidance on the application process for criminal records checks overseas - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/guidance-on-the-application-process-for-criminal-records-checks-overseas)

Sign a declaration confirming the information they have provided is true

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

Seeking references and checking employment history

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

When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate

- Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

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

Pre-appointment vetting checks

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

New staff

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

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

- Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state

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

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

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

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

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

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

Agency and third-party staff

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

Contractors

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

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

We will obtain the DBS check for self-employed contractors.

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

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

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

Trainee/student teachers

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

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

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

Governors and members

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

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

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

The chair of the board will have their DBS check countersigned by the secretary of state.

All proprietors, trustees, local governors and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008).
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings

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

Adults who supervise pupils on work experience

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

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

Pupils staying with host families

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

30 Mobile phones and cameras

Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils.

Staff will not take pictures or recordings of pupils on their personal phones or cameras.

Staff may take pictures or recordings of pupils on a school owned device, however staff must ensure they do not take an image/recording of a child for whom permission has not been granted by the parent/guardian. Pictures/recordings should not be sent/forwarded to a personal device/email address or any SD card containing pictures/recordings taken home for use on a personal device.

The school will follow the GDPR when taking and storing photos and recordings for use in the school.

Visitors to school must not use any personal device to take pictures or any recordings whilst on the school premises unless permission is granted by the Academy Principal.

31 Lockdown Procedure

Please refer to the school's Lockdown Procedure for further information.

32 Bomb Threat Procedure

Please refer to the school's Bomb Threat Procedure for further information.

33 External lettings and safeguarding

- The Governing Body of Goldington Academy controls the use of the School's premises both during and outside of school hours.
- Where the Governing Body provides services or activities directly under the supervision or management of School staff, the school's arrangements for child protection will apply.
- Where services or activities are provided separately by another body, the Governing Body will seek assurance that the body / organisation / hirer concerned has appropriate policies and procedures in place with regard to safeguarding vulnerable groups, children and/or young people.
- In order to demonstrate that the school has taken all reasonable precautions to ensure the safeguarding of vulnerable groups, children and young people, the hirer will be required to complete the Safeguarding Information attached to the application Form (see Lettings Policy).

- Where a form requires schools to judge whether an organisation's Child Protection Policy covers at least the minimum requirements, the nominated Safeguarding Officer and Safeguarding Governor will complete a checklist to ensure that the Organisation meets the necessary requirements.
- Where an organisation does not have a policy, or where their policy is inadequate, the organisation can choose to adopt the School's Child Protection and Safeguarding Policy or can approach the local safeguarding partners to obtain a model policy.
- The Hirer has an appropriate Safeguarding Policy and Procedure that clearly describes what individuals have to do in order to keep vulnerable groups safe. The Hirer agrees to provide a copy of that policy to the nominated Safeguarding Officer at Goldington Academy.
- The Hirer will have a designated person, or champion, for safeguarding. The champion should be an individual whose responsibility is essentially to make sure that things written in the Safeguarding policy and procedure really happen.
- Selection and vetting of volunteers and staff should be rigorous and properly conducted. As a minimum this should include the rigorous checking of references and making appropriate Disclosure and Barring Service (formerly Criminal Records Bureau) checks.
- The Hirer should have a training and information plan whereby staff can be helped to be made aware of safeguarding children issues and to recognise when something is wrong. It is important this is part of a new volunteer or staff member's induction
- Until such time as the Safeguarding information and checks are provided and completed a letting cannot be confirmed.
- In the event that the school receives an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children, the school will follow the safeguarding procedures as set out in this policy, including informing the LADO.

Links to other policies/procedures

- E safety
- Bomb threat procedure
- Lockdown procedure
- Whistleblowing
- SEND
- Pastoral Care, Guidance and Support
- Attendance
- Behaviour
- Lettings
- Visitors Policy
- Code of Conduct for all adults
- Voluntary Helpers
- Recruitment Selection Policy and Procedures
- Recruitment of Ex-Offenders
- Intruder
- Equality Policy
- LAC/PLAC Policy
- Dealing with allegations of abuse against Teachers, Other Staff and Volunteers
- Anti-Bullying

Appendix 1a Safeguarding Children Record of Concern

Name of Child:	DOB:
	Class:
Person initiating the conversation/concern:	Other parties involved in meeting:
Time of conversation/concern:	Length of conversation:
Summary:	
Signed:	Date:
Print Name:	Position:
Received by:	Date:
Action taken:	
Date:	
Time:	

Safeguarding Children
Record of concern continued

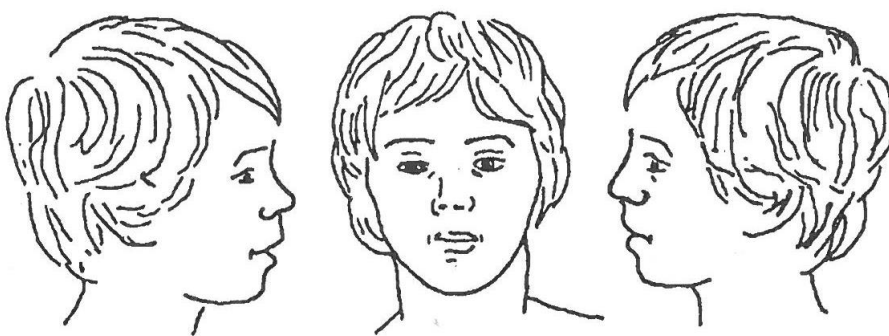
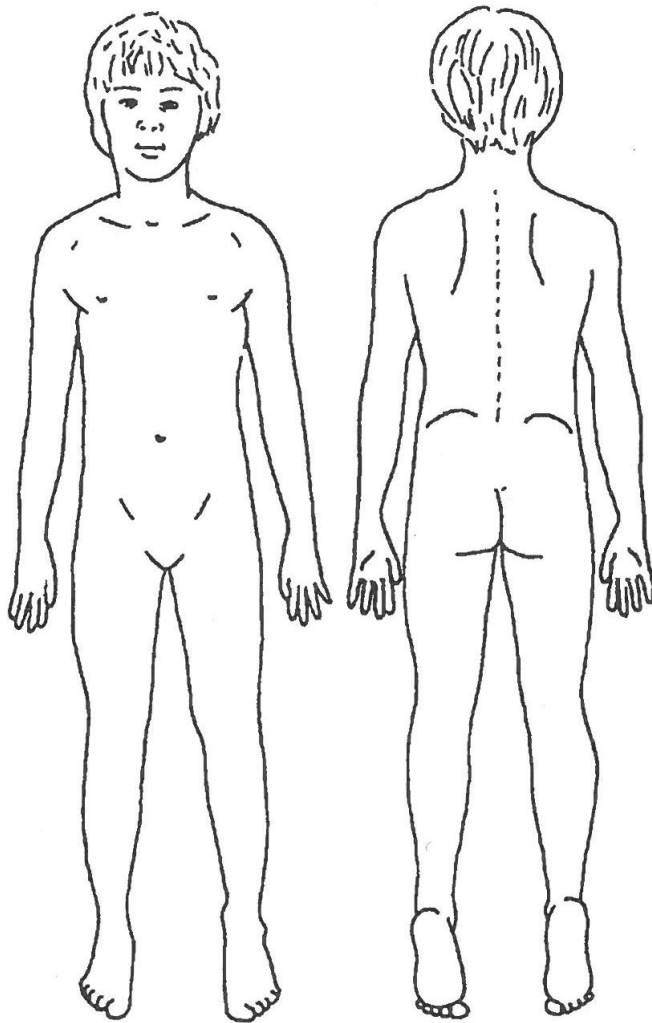
Response to action:

Date:

Time:

Other Actions taken:

Body Map



Appendix 2 Section 1 allegations that may meet the harms threshold

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

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

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

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

The LADO (Local Area Designated Officer) must be contacted and the details of the concerns shared with them. The LADO will provide further guidance at this stage.

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

Suspension of the accused until the case is resolved

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

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted

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

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation

- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

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

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

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

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

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

Additional considerations for supply teachers and all contracted staff

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

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

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

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

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 5 working days

- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

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

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

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

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

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

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

Confidentiality and information sharing

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

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

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

Record-keeping

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

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

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

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

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

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

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

Learning lessons

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

This will include consideration of (as applicable):

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

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

Non-recent allegations

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

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

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

Allegations against organisations or individuals using school premises

In the event that the school receives an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children, the school will follow the safeguarding procedures as set out in this policy, including informing the LADO.

Allegations against Governors

If an allegation is made against a governor, schools and colleges should follow their own local procedures. Where an allegation is substantiated, they should follow the procedures to consider removing them from office.

Section 2: Low level concerns that do not meet the harm threshold

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

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

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

Definition of low-level concerns

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

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

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area
- Using inappropriate sexualised, intimidating or offensive language

Sharing low-level concerns

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per the Whistleblowing policy.
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage

- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Low level concerns must be referred directly to the Principal as soon as possible in writing via CPOMS Staffsafe. If this is not possible for any reason then any other written form of communication will suffice. The referral should remain confidential at all times.

Responding to low-level concerns

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

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

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's code of conduct for all staff.

Record keeping

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

Records will be:

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

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

References

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

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Appendix 3 Specific safeguarding issues

Children missing from education

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

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

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

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

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

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

Bullying

While bullying between children is not a discrete category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. All incidences of bullying should be reported and will be managed through our anti-bullying policy and procedures.

A copy of the Academy's Anti-bullying policy is available on the website, in the school office and further information is provided in the Home/School Agreement.

As well as this, the subject of bullying is addressed at regular intervals in the Life Skills curriculum, through the Computing curriculum, through assemblies and numerous pastoral interventions. If the bullying is particularly serious, or the anti-bullying procedures are deemed to be ineffective, the head teacher and the Designated Safeguarding Lead will consider implementing child protection procedures. DfE advice on Cyberbullying can be found here:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/374850/Cyberbullying_Advice_for_Headteachers_and_School_Staff_121114.pdf

Please refer to the Academy's Anti Bullying Policy for further information.

Child criminal exploitation

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

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

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

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

For more information, please visit [Criminal exploitation of children and vulnerable adults: county lines - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/374850/Criminal_exploitation_of_children_and_vulnerable_adults_county_lines_-_GOV.UK.pdf).

Child sexual exploitation

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

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

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

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

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

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

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

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

Domestic abuse

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home.

Older children may also experience domestic abuse and/or violence in their own personal relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

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

Homelessness

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

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

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

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

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

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

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

FGM

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

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

Indicators that FGM has already occurred include:

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

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

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

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

[Female Genital Mutilation - Prevent & Protect | NSPCC](#)

Forced marriage

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

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

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

The DSL will:

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

Preventing radicalisation

- **Radicalisation** refers to the process through which a person legitimises support for or use of terrorist violence.
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- **Terrorism** is an action that:
 - Endangers or causes serious violence to a person/people;
 - Causes serious damage to property; or
 - Seriously interferes or disrupts an electronic system

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

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

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

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

Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion

- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

If staff are concerned about a pupil, they will follow our procedures set out on page 24 of this policy, including discussing their concerns with the DSL.

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

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures.

Child on child abuse

Child on child abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

If staff have any concerns about child on child abuse, or a child makes a report to them, they will follow the procedures set out on page 24 of this policy, as appropriate.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

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

Sexual violence and sexual harassment exist on a continuum and may overlap.

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

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

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in the corresponding section of this policy.

Serious violence

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

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance

- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

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

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

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

For more information, please visit [Advice to schools and colleges on gangs and youth violence - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence)

Appendix 4 FORM FOR RECORDING AN INCIDENT – SAMPLE

This form should be completed following an incident involving Positive Handling and kept by the school for future reference.

NAME(S) OF STUDENT (S) GENDER: M/F ETHNICITY:

DATE(S) TIME(S):

NATURE OF INCIDENT: verbal abuse, threatening behaviour, refusal, kicking, punching, bullying, fighting, other (please specify below):

INVOLVING: staff, students, property, equipment, other (please specify below):

Why was Positive Handling Necessary?

Clearly define the circumstances that led to the incident, describing the student's behaviour, the danger perceived, and the restraint used. (Continue on a separate sheet if necessary)

FURTHER ACTION TAKEN BY THE HEADTEACHER

Appendix 5 PAN BEDFORDSHIRE CHILD SEXUAL EXPLOITATION RISK IDENTIFICATION TOOL

This tool should be developed alongside with and complimenting any other plan for the young person's welfare.

THE FOLLOWING INFORMATION IS REQUIRED WHEN THERE ARE CONCERNS REGARDING A CHILD BEING AT RISK/OR EXPERIENCING CHILD SEXUAL EXPLOITATION

Contact details of assessor:
Date assessment completed:
Line manager name:

Date assessment sent:

INFORMATION REPORT – CHILD/YOUNG PERSON'S DETAILS

Full name (and aliases):
Date of Birth:
Emergency contact (name and number):
Details of primary carer:
Foster Care (Y/N):
Residential Placement (Y/N)

Home address and contact number:
Gender:
Local Authority area (if known):
GP Details and contact number:
Adopted (Y/N)
Religion:

Disability (if so what?):

Known to Social Care or Early Help (Y/N):

Known to Police (Y/N):

Known to YOS (Y/N):

Known to CAMH (Y/N):

Known to other services?:

Please state your reasons for completing this form:

How does this disability impact upon the child/YP being able to protect themselves?:

Reference number:

Reference number (PNC):

Reference number:

Reference number

Reference number:

1. EDUCATION	Risk Indicators	Yes/No/ Unknown
No risk identified	No concerns identified in this area which relate to sexual exploitation. Concerns relate to behaviours which relate to normal child/young person behaviours.	
GREEN Vulnerable to CSE	Mainly engaged in employment/ school/ training. Some truanting but limited concerns.	
AMBER Emerging risk of CSE	Full-time education/training or employment but irregular/poor attendance/whereabouts during school hours often unknown. Attendance at PRU/poor attendance. Regular breakdown of school/training placements due to behavioural problems.	
RED Likely to be involved in CSE	Regular breakdowns of school/training placements due to behavioural problems. Not engaged in education/employment or motivated to be. Excluded. Whereabouts often unknown. Claims to have been in the UK for years but hasn't learnt the local language or understand the culture (THB risk)	
Protective factors	For example (not exhaustively): Is there a particular person that they engage well with at school? Are there supportive friendships with people that serve as role models/mentors? Are the family supportive of school and encourage attendance?	
<i>Consider: what is the child/young person's attendance like? Are there patterns in their disengagement from school/college: particular time of the day/days of the week? Is there an effective awareness of the young person's whereabouts during school hours? Consider their attachment to learning and achieving and how this might affect their vulnerability to CSE.</i>		
Analysis of risk/ protective factors		

2. ENGAGEMENT WITH SERVICES	Risk Indicators	Yes/No/ Unknown
No risk identified	No concerns identified in this area which relate to sexual exploitation. Concerns relate to behaviours which relate to normal child/young person behaviours.	
GREEN Vulnerable to CSE	Inconsistent engagement, some difficulty in contacting the child/young person which raises concern.	
AMBER Emerging risk of CSE	Some engagement but sporadic contact, often misses appointments, limited explanation, professional concern.	
RED Likely to be involved in CSE	None or very little engagement, frequently fails to attend appointments, or no contact/engagement with services. Limited explanations. Withdrawn and refuses to talk/appears afraid to talk to a person in authority (THB risk)	
Protective factors	For example (not exhaustively): Is there a particular service or person that they engage well with? Are there supportive adults outside of the family who serve as role models/mentors? Are the family supportive of services and/or encourage interaction or engagement?	

Consider: whether there are particular agencies whom the child/young person does/does not engage with. If you suspect they are a victim of exploitation, are they willing to accept support to reduce the risk of harm to them? Consider their willingness to accept they might be a victim and how this might have an impact upon them.

**Analysis of risk/
protective factors**

3. RUNNING AWAY/GOING MISSING	Risk Indicators	Yes/No/Unknown
No risk identified	No concerns identified in this area which relate to sexual exploitation. Concerns relate to behaviours which fall within normal child/young person behaviour.	
GREEN Vulnerable to CSE	Often comes home late/incidents of absence without permission and returning late. Whereabouts often unknown.	
AMBER Emerging risk of CSE	Often staying out late or overnight without permission/explanation. Whereabouts at times unknown. Repeated episodes of running away/going missing/unauthorised/temporary absences (may be for short periods). Regular breakdown of placements due to behavioural problems.	
RED Likely to be involved in CSE	Frequently reported missing due to/extensive and/or frequent periods of missing/running away/missing from placement. Whereabouts often unknown or locating in locations of concern. Looking well cared-for/not hungry, despite having no base. Regular breakdown of placements due to behavioural problems. Pattern of street homelessness.	
Protective factors	For example (not exhaustively): Is there a particularly supportive person that the child/young person contacts when they are missing? Are there actions that can be put in place that have stopped the child/young person running away previously? Is there good parental/guardian monitoring of the child/young person?	

Consider: the location where the child/young person was found. Who they went missing with and for how long. Do you suspect the child/young person is missing more often than they are reported? Do you suspect they are placing themselves at risk when they are missing?

5. REWARDS	Risk Indicators	Yes/No/ Unknown
No risk identified	No concerns identified in this area which relate to sexual exploitation.	
GREEN Vulnerable to CSE	Some unaccounted for monies and/or goods (new clothes, make-up, CD's etc).	
AMBER Emerging risk of CSE	Concerns about unaccounted for monies and/or goods, especially jewellery and mobile phones, which the child/young person is unable to provide an explanation for. Has use of more than one mobile phone. Funding misuse of drugs/alcohol/use of tobacco through unknown sources.	
RED Likely to be involved in CSE	Significant concerns regarding unaccounted for monies and/or goods, especially jewellery and mobile phones, which the child/young person is unable to provide an explanation for. Has use of more than one mobile phone. Funding misuse of drugs/alcohol/use of tobacco through unknown sources.	
Protective factors	For example (not exhaustively): Family expectations of pro-social behaviour, positive relationship with parents/carers or other responsible adult.	

4. SEXUALISED RISK TAKING	Risk Indicators	Yes/No/ Unknown
No risk identified	No concerns identified in this area which relate to sexual exploitation	
GREEN Vulnerable to CSE	Some concerns about sexualised dress (girls)/attire. Some reports of getting into cars with unknown peers/adults. Contacting unknown adults/older peers through the internet.	
AMBER Emerging risk of CSE	Some concerns about sexualised dress (girls)/attire. Reports of getting into cars with unknown peers/adults. Having access to premises unknown to parents/carers. Concerns about the level of contact with adults/older peers through the internet and/or meeting adults/older peers via the internet. Clipping (offering to have sex and then running upon payment). Using the internet to share/send inappropriate images. Older boyfriend (5+ years)	
RED Likely to be involved in CSE	Overt sexualised dress (girls)/attire. Reports of getting into cars with unknown peers/adults. Having access to premises unknown to parents/carers. Clipping (offering to have sex and then running upon payment). Use of internet to regularly meet unknown adults/peers/use of internet to share/send inappropriate images. The child/young person associating with other children/young people/adults known to be involved with sexual exploitation. Evidence of sexualised bullying via the internet/social media sites. Older boyfriend (5+ years)	
Protective factors	For example (not exhaustively): Family/carer have expectations of pro-social behaviour. Child/young person has positive self-esteem, parental/guardian monitoring of behaviour. Internal locus of control. Positively engages with sexual health services. Access to health care and social services.	

7

Consider: For girls, are they wearing particularly revealing or age inappropriate clothing? Do they talk about sex or having sex when under-age?

Consider: Does the child/young person have access to money or goods that they have no way of purchasing themselves? Is there a sudden change in their appearance? E.g. designer clothes.

Analysis of risk/protective factors

6. CONTACT WITH ABUSIVE ADULTS/RISKY ENVIRONMENTS

Risk Indicators

Yes/No/
Unknown

No risk identified

No concerns identified in this area which relate to sexual exploitation.

GREEN

Vulnerable to CSE

Associating with unknown adults and/or other children known to be at risk of sexual exploitation.

AMBER

Emerging risk of CSE

Associating with unknown adults and/or other sexually exploited children/YP. Extensive use of phone, particularly late at night and secret use. Use of more than one mobile phone. Has access to premises not known to parent/carer. Reports from a reliable source suggesting involvement in sexual exploitations. Reports of being in areas where there are concerns related to sexual exploitation and/or street sex work is known to take place.

RED

Likely to be involved in CSE

AND, evidence of association/ relationships with adults/older peers believed/ known to be involved in grooming/exploitation. Seen/or picked up, in areas where street sex work is known to take place. Accompanied by an adult who is not the legal guardian and insists on being present at all times (THB risk). Accompanying adult known to have made visa applications for multiple other children/YP who are not relations (THB risk).

Protective factors

E.g.: secure attachments with responsible adult(s), active coping style, positive self-esteem, household rules/structure.

Consider: Some of the above factors may demonstrate a higher risk for some young people than others. Consider their access to income. What do you know about those with whom the young person spends their time? Are they open or secretive about their friends? In this context

'risky' means that they either present a direct risk to the young person (i.e. in terms of physical violence or sexual abuse/exploitation) or they are likely to draw the young person towards other adults/peers who present this risk.

Analysis of risk/
protective factors

7. COERCION/ CONTROL/ ASSOCIATION WITH GANGS	Risk Indicators	Yes/No/ Unknown
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No risk identified	No concerns identified in this area which relate to sexual exploitation.
GREEN Vulnerable to CSE	Reduced contact with family/friends, which raises concern. Some concerns about significant relationships.
AMBER Emerging risk of CSE	Limited contact with family/friends. Appears to be 'controlled'/negatively influenced by others. Concerns about significant relationships and domestic abuse/violence. Disclosure of physical/sexual assault followed by withdrawal of allegation. Physical injuries – external/internal.
RED	No contact with family/friends. Disclosure of physical/sexual assault followed by withdrawal of allegations. Physical injuries – external/internal. Concerns that

Likely to be involved in CSE

relationship might involve abuse/violence/be controlling. Abduction/forced imprisonment (described by young people as 'locked in'), disappears from system (no contact with support systems).

Protective factors

For example (not exhaustively): Supportive adults outside of family who serve as role models/mentor to the child/young person. Family expectations of pro-social behaviour. Extended family support and involvement. Supportive family environment.

Consider: Who the child/young person spends the majority of their time with and how this might affect their vulnerability to CSE. Whether you feel they are able to make free choices over where they spend their time and who with?

Analysis of risk/protective factors

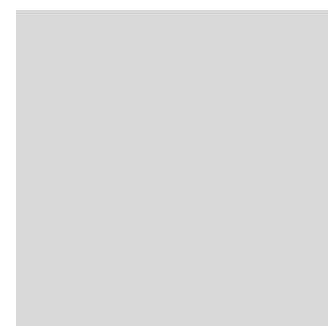
8. SEXUAL HEALTH	Risk Indicators	Yes/No/ Unknown
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No risk identified	No concerns identified in this area which relate to sexual exploitation.
GREEN Vulnerable to CSE	Evidence of having/had a sexually transmitted disease.

AMBER Emerging risk of CSE	Recurring or more than one sexually transmitted disease. Miscarriage(s), concerns about untreated STI's.
RED Likely to be involved in CSE	Recurring or multiple STI's. Concerns about untreated STI's. Miscarriage(s), termination(s), physical evidence of forced sexual activity.
Protective factors	For example (not exhaustively): Access to health care, parents/carers supportive/encouraging around health care. Active coping style, parental monitoring of the child/young person.
<i>Consider: Age of the child/young person and their level of maturity. Is the young person open or secretive about their health and/or sexual health? Do you have concerns about their use of contraception, or for young women, their menstrual cycles? If they are attending health services regularly: are they attending alone or with someone? Is this of concern?</i>	
Analysis of risk/protective factors	

9. SUBSTANCE MISUSE		Risk Indicators	Yes/No/Unknown
No risk identified	No concerns identified in this area which relate to sexual exploitation.		
GREEN Vulnerable to CSE	Mild use of substances (including alcohol), experimenting with drug/alcohol.		
AMBER Emerging risk of CSE	Evidence of regular substance (including alcohol) use. Concerns for use/dependency & change/increase of use.		
RED	Evidence of heavy/dependant/worrying substance misuse (including alcohol). Chronic dependency of highly addictive		

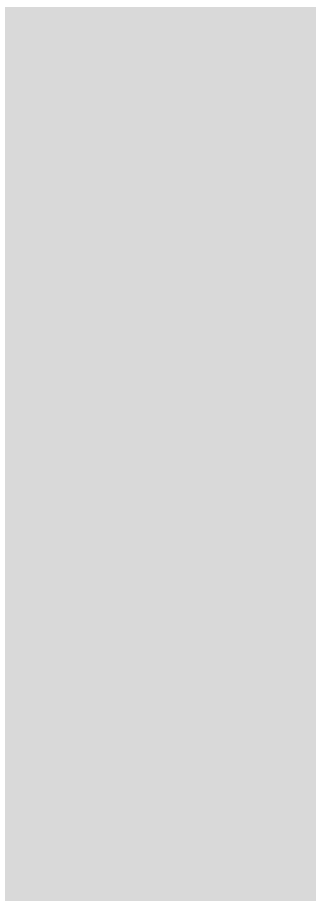
Likely to be involved in CSE	substances. Concerns for use/dependency/increase of use/funding of usage.
Protective factors	For example (not exhaustively): Family expectations of pro-social behaviour. Access to drug and alcohol services. Support/encouragement from parent/guardian/trusted adult to access services. Parental/guardian monitoring of the child/young person.
Consider: Type of substance(s), including legal highs. How might the child/young person be funding their use/who might be supplying them. Where? Who with? And how often are they using substances? Substance misuse may be cause or effect of exploitation.	
Analysis of risk/protective factors	



10. EMOTIONAL HEALTH	Risk Indicators	Yes/No/Unknown
No risk identified	No concerns identified in this area which relate to sexual exploitation.	
GREEN Vulnerable to CSE	Concerns regarding fatigue, poor self-image, expressions of despair, low mood, self-harm, cutting, overdosing, eating disorder. Sexualised risk taking.	
AMBER Emerging risk of CSE	Chronic low self-esteem/self-confidence, expression of despair. Internal (self-harm): cutting, overdosing, eating disorder. Sexualised risk taking. External (intensive acting out) bullying/threatening behaviour, violent outbursts, offending behaviour.	
RED Likely to be involved in CSE	Chronic low self-esteem/self confidence. Mental health problems, expressions of despair, internal (self harm): cutting, overdosing, eating disorder, previous	

	suicide attempts, sexualised risk taking. External (intensive acting out): bullying/threatening behaviour, violent outbursts, offending behaviour.
Protective factors	For example (not exhaustively): good social skills, internal locus of control, good balance between help seeking and autonomy, secure attachments, positive and warm parent-child relationships.
<i>Consider: Any recent changes in emotional health and what these might be associated with, e.g. bereavement. Whether the young person is willing to engage with services or support to meet their emotional needs.</i>	
Analysis of risk/protective factors	

11. ACCOMMODATION	Risk Indicators	Yes/No/Unknown
No risk identified	No concerns identified in this area which relate to sexual exploitation.	
GREEN Vulnerable to CSE	Some accommodation issues/concerns, but overall accommodation meets the child/young person's needs.	
AMBER Emerging risk of CSE	Unsuitable/unstable/temporary/overcrowded /hostel/refuse/unsupported. The child/young person is unhappy with their accommodation.	
RED Likely to be involved in CSE	Unsuitable/unstable/temporary/overcrowded /hostel/refuse/unsupported. Concerns about location, the child/young person is unhappy with their accommodation and often stays elsewhere. Homeless/sofa surfing. Care leaver or looked after child.	
Protective factors	For example (not exhaustively): Household rules/structure, secure attachment, supportive family environment, adequate housing.	
<i>Consider: What the child/young person's care status is and whether this makes them more vulnerable to CSE. If living independently, consider who might have knowledge of the young person's whereabouts and safety.</i>		
Analysis of risk/protective factors		



12. FAMILY RELATIONSHIPS	Risk Indicators	Yes/No/ Unknown
No risk identified	No concerns identified in this area which relate to sexual exploitation.	

GREEN Vulnerable to CSE	Carer(s) show warmth, support the child and have good/positive relationship with the child/YP. The child/YP has positive friendships but reported reduced contact with family/friends which is of concern. Change in relationships.
AMBER Emerging risk of CSE	Carer(s) lack understanding, tolerance and warmth towards the child. Parents fail to report missing episodes. Family relationships are strained. Friends/carers report a change in behaviour/reduced contact with the child. Family/friends/peers are known offenders.
RED Likely to be involved in CSE	There is little or no communication between the carer(s). There is a lack of warmth/understanding/attachment and/or trust. Parents fail to report missing episodes. Breakdown in family relationship/no contact. Family/friends/peers are known offenders.
Protective factors	e.g. secure attachment with parent/carer/responsible adult, positive and warm parent-child relationship. Supportive family environment, 'parental' monitoring of child, extended family support and involvement, including caregiving help. Stable relationship with parents/carers, parents have a model of competence and

	good coping skills, family expectation of pro-social behaviour, high parental education.
<i>Consider: How the above indicators affect the young person's vulnerability to CSE. Whether there has been a recent change in communication/relationships and what may have caused this. Are there factors affecting the parents capacity to effectively safeguard the YP: substance misuse, mental health etc. Are parent/carers aware of who the YP's friends are? Who they spend their time with? Any changes in sibling relationships?</i>	
Analysis of risk/protective factors	

13. RISK TO OTHERS	Risk Indicators	Yes/No/Unknown
No risk identified	No concerns identified in this area which relate to sexual exploitation.	
GREEN Vulnerable to CSE	No identified risk to others, but mild concern about influence on other children and Y/P.	
AMBER Emerging risk of CSE	Concerns regarding negative influence on others. Concerns that the child might expose other children to risky situations. Bullying and threatening behaviour. Offending behaviour.	

RED Likely to be involved in CSE	Places other children at risk of child sexual exploitation (grooms/ exploits/ recruits others). Displays violence towards others, angry outbursts (incl. family members/carers). Bullying/threatening behaviour. Offending behaviour.
Protective factors	For example (not exhaustively): Good peer relationships, positive disposition, good social skills, positive self-esteem.
<i>Consider: Have there been any recent changes in their behaviour towards others? (peers, siblings). Who has reported the change in behaviour.</i>	
Analysis of risk/protective factors	

14. EXPERIENCE OF VIOLENCE	Risk Indicators	Yes/No/Unknown
No risk identified	No concerns identified in this area which relate to sexual exploitation.	
GREEN Vulnerable to CSE	No known reported incidents of the child/young person being a victim of violence or witnessing domestic abuse, although some professional concern.	
AMBER Emerging risk of CSE	Concerns that the child/YP has been/is being exposed to violence in the home and/or from others. Abusive significant relationship. Disclosure of physical/sexual assault followed by withdrawal of allegation. Physical symptoms suggestive of physical/sexual assault.	
RED Likely to be involved in CSE	Known abuse towards the child/YP from family members. Peers/older friends/partners are violent towards the child. Abusive significant relationship. Physical injuries – external/internal disclosure of assault.	
Protective factors	For example: supportive adults outside of family who serve as role/models/mentors to the child/young person, agencies	

	involved with whom the child/YP engages with, access to health services.
<i>Consider: Has there been previous domestic abuse within the family? Is the child/young person trying to conceal bruises/cuts? Are there unexplained injuries?</i>	
Analysis of risk/protective factors	

15. USE OF SOCIAL MEDIA/ TECHNOLOGY	Risk Indicators	Yes/No/Unknown
No risk identified	No concerns identified in this area which relate to sexual exploitation.	

GREEN Vulnerable to CSE	Talking to/communicating with unknown adults/ peers via the internet (social media messaging services, e.g. BBM)
AMBER Emerging risk of CSE	Use of internet to share inappropriate or sexual images. Meeting in person, adults or peers, following contact via social media. Concerns young person may be being groomed. Lack of awareness of online safety. Extensive/secretive use of mobile phone. More than one mobile phone.
RED Likely to be involved in CSE	Use of internet to regularly meet in person unknown adults/peers. Secretive use of social media/online gaming/webcam. Evidence of sexual bullying through social media/internet.
Protective factors	E.g. good peer relationships (off-line), parental monitoring of child/young person, positive and warm parent-child relationship.
<i>Consider: Age of young person and access to internet and technology appropriate to their age. Any recent changes in behaviour which cause concern. Please remember that online abuse victims do not have 'recognised' vulnerabilities associated with other forms of CSE but this does not mean they are not being exploited.</i>	
Analysis of risk/protective factors	

	FAMILY: Abuse/neglect in the family. Parental substance misuse. Parental mental health. Adult prostitution.
OTHER CHILD/YOUNG PERSON AND FAMILY	CHILD/YOUNG PERSON: Learning disabilities. Financially unsupported. Migrant/refugee/asylum

FACTORS TO CONSIDER	seeker. Death/loss or illness of significant person in the child/young person's life. Excessively afraid of deportation.

OTHER COMMENTS	Any other comments related to risk/protective factors.
	Supervisor/SPOC review/comments

Summary of RAG scores		RAG	Protective Factors (Y/N)
1	Engagement with services		
2	Education		
3	Running away/going missing		
4	Sexualised risk taking		
5	Rewards		
6	Contact with abuse adults/ risky environments		
7	Coercion/control		
8	Sexual health		

9	Substance misuse
10	Emotional health
11	Accommodation
12	Family relationships
13	Risk to others
14	Experience of violence
15	Use of social media/technology

Key:

No RISK No risk identified	No concerns which relate to sexual exploitation
GREEN Vulnerable to CSE	The child/young person is vulnerable to sexual exploitation
AMBER Emerging risk of CSE	There is an emerging risk of CSE/Possibly being targeted/groomed for sexual exploitation
RED Likely to be involved in CSE	Likely to be involved in sexual exploitation/ current victim of sexual exploitation
PROTECTIVE Protective factors	Has some factors which are protective.

If through this assessment there are indications that there are emerging risks of CSE or that the child/young person is likely to be involved in sexual exploitation

WHEN TO CALL THE POLICE

Guidance for schools & colleges

Appendix 6 When to call the police

and they do not already have an allocated social worker, please refer the case to your local Integrated Front Door attaching this risk assessment.

<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf>

INTRODUCTION



Who is this for?

This advice is for school and college staff with responsibility for behaviour management, including designated safeguarding leads (DSLs), their deputies, head teachers and senior leadership teams in schools and colleges in England.

What does this advice cover?

This advice covers incidents on school and college premises where students have potentially committed a crime. It provides guidance on what schools and colleges should bear in mind when considering contacting the police. This advice covers the following situations:

- Assault
- Criminal damage
- Cyber crime
- Drugs
- Harassment
- Sexual offences
- Theft
- Weapons

This advice aims to support schools and college to make defensible decisions when considering whether to involve the police.

Safeguarding incidents

This advice does not cover safeguarding incidents. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately. Referrals should follow the local referral process.

Chapter 1 of working together to safeguard children explains that the safeguarding partners should publish a threshold document that should include the criteria, including the level of need, for when a case should be referred to local authority children's social care for assessment and for statutory services under section 17 and 47 of the Children's Act 1989.

Local authorities, with their partners, should develop and publish local protocols for assessment. A local protocol should set out clear arrangements for how cases will be managed once a child is referred into local authority children's social care.

Sexual offences

In the case of incidents involving sexual offences, schools and colleges should refer to local safeguarding protocols, alongside [Keeping children safe in education](#) and [Sexual violence and harassment between children in schools and colleges](#) guidance.

In cases involving youth produced sexual imagery – often called 'sexting' – schools and college may refer to the non-statutory [UKCCIS sexting in schools and colleges guidance](#).

What is the status of this advice?

This advice has been produced by the National Police Chiefs' Council working alongside the Department for Education, Home Office and the PSHE Association.

This advice is non-statutory and should be read alongside the Department for Education's (DfE) keeping children safe in education statutory guidance and non-statutory searching, Screening and Confiscation advice for schools.

Police assistance is required

All other non-emergency incidents should be reported using 101 or online reporting methods, or through existing arrangements, for example, to a safer schools officer. The call will be logged by an operator and depending on the nature of the incident the appropriate response made.

Contact with police should ideally be made by a single point of contact from the school. This may be the headteacher or the designated safeguarding lead. Every school and college should have a designated safeguarding lead who will provide support to staff to carry out their safeguarding duties and who will liaise closely with other services such as children's social care. The designated safeguarding lead (and any deputies) are most likely to have a complete picture of safeguarding and be the most appropriate person to advise on the response to safeguarding concerns.

Having a single point of contact between a school or college and the police helps increase consistency in referrals.

Contacting the police

In an emergency dial 999. This should be used if:

- There is a danger to life or
- Risk of serious injury or
- A serious crime is in progress or about to happen.

Any member of staff witnessing such an incident should be empowered to dial 999 as they will be able to give the most accurate account of the incident.

Making a decision to involve the police

When an incident occurs in which a crime has or may have been committed, the school or college need to consider whether to involve the police. Many incidents can be dealt with and resolved internally. The school or college behaviour policy will give guidance on how to deal with and record such incidents.

This guidance document outlines the factors which school or college leaders should consider when deciding to involve the police. These considerations would inform whether the police would expect and need to be involved.

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

Things to consider

In making a decision to involve the police it is important that the school or college ensure a balance is struck between the needs of the students involved and the needs of other students and the wider school or college community.

It is not always clear initially who is involved in an incident and in what capacity. The victim in any incident should be supported and protected as a priority. Those suspected of being the offender will also need to be supported. There will often be significant circumstances in a young person's life that are contributing factors to an incident and it is important that they are taken into consideration.

The seriousness of the incident will be a judgement call for the school or college. In making this decision the level of harm and the circumstances leading to the incident would need to be carefully considered.

Any aggravating factors which contribute to making the incident and subsequent level of harm more serious would be relevant in making a decision on whether or not to involve the police.

Ideally the decision as to whether the school or college deal with an incident internally or pass it over to the police needs to be made at the initial stage, by gathering only enough information to establish the facts of the case.

The school or college should be aware that they may not be aware of all circumstances leading to or connected to the incident i.e. students behaviour or involvement outside school or within their family. Contacting the police or other agencies may allow a further picture to be obtained, which assists in making informed decisions.

When the decision is made that the school or college will deal with the incident internally, it remains the responsibility of the school or college to investigate and resolve it in accordance with their behaviour policy. Parental cooperation should be maintained throughout and the incident and actions recorded.

The designated safeguarding lead (or a deputy) should be leading the schools or college's response and should be aware of the local process for referrals to children's social care and making referrals to the police.

Schools and colleges should be aware that if a referral is made to children's social care, this may result in a subsequent referral to the police.

Many schools and colleges have close relationships with their local police force and many police forces have a permanent or semi-permanent police presence in schools and colleges. The designated safeguarding lead (or deputy) should be liaising closely with the local police when an incident in which a crime may have been committed occurs.

Vulnerable young people



All staff should be prepared to identify children and young people who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a young person's life, from the foundation years through to the teenage years.

Some areas of vulnerability are highlighted below, but should not be seen as a comprehensive list. It's important to note that most children and young people with vulnerabilities do not commit offences.

However, the challenges that children and young people with vulnerabilities are facing can sometimes contribute to behaviour which may lead them to unwittingly commit offences.

All school and college staff should be particularly alert to the potential need for early help for a child or young person who:

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory education, health and care plan)
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking or exploitation
- is at risk of being radicalised or exploited
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is a privately fostered child
- is a child in care
- has experienced recent trauma ie bereavement

Crimes reported to the police

When the decision is made to report an incident to the police for investigation, due to the seriousness of the incident or for other aggravating circumstances, the school or college should cease their own investigation, having asked only enough questions to establish the basic facts of the incident. Every effort should be made by the school or college to preserve any relevant evidence.

Initial enquiries undertaken by the school or college should be fully documented as they may be required if the matter goes to court. This includes recording questions asked to young people and their replies.

Where a crime is reported to the police, it will be recorded as a crime and an investigation will commence.

Whilst the age of criminal responsibility is ten, if the alleged perpetrator of a crime is under ten, it may still be necessary to involve the police. The police will take a welfare approach in these cases rather than a criminal justice approach.

Arresting on school or college premises

Arresting on school or college premises should be avoided unless the seriousness and urgency of an incident deems the arrest absolutely necessary. The head teacher should always be made aware of the situation and the arrest should be conducted as discreetly as possible.

In any incident where a crime may have occurred schools and colleges should consider:

- The seriousness of the incident. Whether an incident is 'serious' will be a matter of judgement and will depend on the type of incident.
- Whether there are any aggravating factors. These factors increase the level of risk, or highlight the need for a wider investigation and the need for the involvement of a range of agencies as well as the police
- Whether the young people involved have any vulnerabilities.
- Whether this could be part of a pattern of behaviour also occurring in the community, in which case the police will want to be involved.

The context of the offence is really important and the school or college are in the best position to gather together all the relevant information prior to making a decision whether or not to report to the police. The decision and the rationale behind it should both be recorded.

What are hate or prejudice based incidents?

Hate incidents and hate crimes are acts of violence or hostility directed at people because of who they are or who someone perceives them to be. The police and Crown Prosecution Service have agreed a common definition of hate incidents.

An incident is considered a hate incident when the victim or anyone else believes that the incident was motivated by hostility or prejudice based on one of the following things:

- disability
- race
- religion
- transgender identity
- sexual orientation

If you believe something is a hate or prejudiced based incident it should be recorded as such by the person you are reporting it to. All police forces record hate incidents based on these five personal characteristics.

When is a hate or prejudice incident also a hate crime?

When hate incidents become criminal offences they are known as hate crimes. Any criminal offence is a hate crime if it is motivated by hostility or prejudice based on disability, race, religion, transgender identity or sexual orientation.



GUIDANCE



The following guide outlines questions schools or colleges should ask for different types of incidents and possible aggravating offence factors to be considered. The context of the offence should always be taken into consideration and the vulnerabilities previously outlined taken into account.

Assault – see flowchart

An act which intentionally or recklessly causes violence to another.

The school or college should first establish:

Are there any injuries?

If there are any suspected broken bones or significant injuries then seek medical help first, then call the police on 101.

If no significant injuries are apparent consider:

- What has happened?
- Who is involved?
- Is there any history between the individuals involved?
- Are there any safeguarding concerns? If YES — Refer to Keeping children safe in education and follow local safeguarding protocols

Are there any aggravating factors?

- Is there a significant age gap between the individuals involved, ie more than a year apart?
- Is there any evidence of injuries?
- Is there evidence of escalating behaviour? Or previous incidents of a similar nature?
- What is the impact on the victim?
- What are the victim's wishes?
- Are there any hate elements?
- Is the assault gang-related?
- Were weapons involved? (see weapons flow chart for the definition of a weapon)

Criminal damage including arson – see flowchart

To destroy or damage property belonging to another either intending to do so or being reckless as to whether damage is caused.

The school or college should be able to deal with most incidents of criminal damage.

**What has happened and who is involved?
Are there any aggravating factors?**

Schools or colleges will need to decide whether to involve the police by establishing:

- Is the damage of a high value? (What constitutes high value is a professional judgement call for the school)
- Is there evidence of escalating behaviour? Or previous incidents of a similar nature?
- Have any threats or violence been used in the course of the damage?
- What is the impact on the victim?
- What are the victim's wishes?
- Is there a hate element?

Schools or colleges may decide that the presence of aggravating factors requires the police to be involved.

Cybercrime – see flowchart

Cybercrime is criminal activity committed using computers and/or the internet. It can involve malicious attacks on computer software, including:

- Breaking IT rules
- Unauthorised access to computers
- Denial of Service or other computer interference and impairment

- Acts causing serious damage to or loss of data
- 'Hacking'
- Cheating at online gaming

This guidance has a focus on offences committed by young people rather than external cybercrime and cyber security. Further guidance can be found at www.ncsc.gov.uk

The school or college should first establish:

- What has happened?
- Who is involved?
- Is this part of a pattern of behaviour?
- Are there any safeguarding concerns? If YES — Refer to Keeping children safe in education – (link) and follow local safeguarding protocols

Are there any aggravating factors?

- Did this incident cause any disruption to the school? eg. loss of access to website and online learning platforms or school communication networks disrupted.
- Did the school suffer a loss of data or corruption of files?
- Did the school suffer loss of teaching time resulting on an impact on other students?
- Is there a hate element?
- Have they expressed any ideological motivation or reason for their actions?
- Is there evidence of escalating behaviour? Or previous incidents of a similar nature?
- Is the behaviour related to gang activity or an Organised Crime Group?
- Do the young people involved have any additional relevant vulnerabilities? This could include:
 - Neurodiversity including Autistic Spectrum Disorder
 - Mental health concerns
 - Living in a chaotic or dysfunctional household or one in which their skills are not likely to be fostered at home
 - In a household with inappropriate ideological influences

- Gang or Organised Crime Group associations
- Socially isolated

Cyber Choices Program

Wherever possible, students should be referred into the Cyber Choices Program. This initiative is aimed at 12-18 year olds supported by the National Crime Agency and the Home Office, together with regional and local police force cyber specialists.

The objective of the program is to encourage students to use their cyber skills positively by highlighting alternative opportunities, along with providing victim awareness and deterrents, such as the potential penalties for continuing along the cybercriminal pathway.

Drugs – see flowchart

Possession: It is an offence for any person to unlawfully have a controlled drug in their possession.

Supply: It is an offence to either supply, be concerned in the supply, offer to supply or be concerned in making an offer to supply a controlled drug.

The school or college should first establish:

What has happened?

- Have drugs been found?
- Who is involved?
- Are there suspicions of drug dealing?

If drugs are found

- Is it on school or college premises?
- Seize the substance — it is legal to possess an illegal substance in order to prevent an offence being committed and then destroy it, or hand it to the police.

- If the substance needs to be kept pending police collection, then it should be securely stored in the school safe.
- Schools and colleges are allowed to dispose of substances. If this action is taken, a witness must be present and the action recorded.

If a student is under the influence of a substance

- If a student is suspected of being under the influence of drugs or alcohol on its premises, the school or college must prioritise the safety of the young person and those around them. If necessary it should be dealt with as a medical emergency, administering first aid and summoning appropriate support. Depending on the circumstances, parents or the police may need to be contacted.
- If the student is seen to be at risk the school or college's safeguarding policy will come into effect and social services may need to be contacted.
- If the student is taken to hospital in an ambulance or receives medical attention at a hospital, parents and carers and the police must be informed. As the student has been placed at significant risk or harm, the police will need to investigate potential offences in relation to the misuse or illegal taking of substances.

A student suspected to be in possession of drugs

- Ask the student to turn out their pockets and bags. Given the circumstance, the designated member of staff is permitted to use reasonable force when conducting a search. However, if a pupil is not compliant or a more personal search is required, consider calling the police to conduct the search.
- The student should be supervised at all times to ensure they have no opportunity to dispose of any substance.
- Ensure that a second adult witness is present throughout and that any action taken is recorded.
- If a substance is found – seize substance – it is legal to possess an illegal substance in order to prevent an offence being committed and then destroy it or hand it to the

police. If the substance needs to be kept pending police collection, it should be stored in the school or college safe. Seal the sample in a plastic bag and include details of the date and time of the seizure/find and witness present.

- Schools and colleges are allowed to dispose of substances. If this action is taken, a witness must be present and the action recorded.
- If a small quantity is found, a school or college can manage the incident in line with their drug policy – consider a referral to a local young person drug service for support and intervention.

The law does not require a school or college to divulge to the police the name of the pupil from whom the drugs were taken but it is advisable to do so;

- Record full details of the incident, including the police incident reference number;
- inform parents/carers, unless this is not in the best interests of the student;
- identify any safeguarding concerns and develop a support and disciplinary response.

Are there any aggravating factors?

- What age are the students involved?
- Is there a large amount or the substance prepared for dealing?
- Are there signs and symptoms of problematic drug use e.g. change of appearance/behaviour?
- Is there any indication of links to gangs or county lines?

If there are rumours of drug use within the school or college

School and college staff are best placed to decide on the most appropriate response to tackling drugs within their school. This is most effective when:

- It is supported by the whole school or college community; with a current schools drugs and alcohol policy in place





- Drug education is part of a well-planned programme of PSHE education delivered in a supportive environment, where students are aware of the school or college rules, feel able to engage in open discussion and feel confident about asking for help if necessary;
- Staff have access to high quality training and support

Involving the police

It is essential to work in partnership with local officers for support and advice and where required, operational intervention.

Drug Dogs and Drug Testing

The National Police Chief's Council does not recommend that drug dogs and drug testing should be used for searches where there is no evidence of the presence of drugs on school or college premises.

Prevention

Schools and colleges should ensure that students have access to and knowledge of up-to-date information on sources of help. This includes local and national helplines (including FRANK for drugs, NHS Smoking Services for tobacco and Drinkline for alcohol), youth and community services and drug services. These sources can be used as part of, or in addition to, the school or college's own drug and alcohol education.

When evaluating the behaviour and safety of students under the Ofsted inspection framework, inspectors will consider student's ability to assess and manage risk appropriately and to keep themselves safe. In supplementary PSHE guidance for subject survey visits, students awareness of the dangers of substance misuse is included in the criteria for inspectors when grading the quality of PSHE delivery.

Behaviour Management

Any response to drug-related incidents must balance the needs of the individual students with the wider school and college

community. In deciding what action to take, schools and colleges should follow their own disciplinary procedures.

Exclusion should not be the automatic response to a drug incident and permanent exclusion should only be used in serious cases. More detail on excluding students can be found in the [DfE exclusion guidance](#).

Drug use can be a symptom of other problems and schools and colleges should be ready to involve or refer students to other services when needed. It is important that schools and colleges are aware of the relevant youth and family support services available in their local area.

Sources of advice and local services should be listed in the school or college drug policy for reference. The senior member of staff responsible for drugs should have established relationships with local agencies to understand what support is available.

Schools and colleges can have a key role in identifying students at risk of drug misuse. The process of identifying needs should aim to distinguish between students who require general information and education, those who could benefit from targeted prevention, and those who require a detailed needs assessment and more intensive support.

Harassment – see flowchart

Causing alarm or distress to another on more than one occasion, which they either know or should have known would amount to harassment of the other.

Harassment can include repeated attempts to impose unwanted communications and contact upon a victim in a manner that could be expected to cause distress or fear in any reasonable person.

- What has happened?
- Who is involved?
- What is the nature of previous incidents?

- Are there any safeguarding concerns? If YES — Refer to [Keeping children safe in education](#) and follow local safeguarding protocols

Are there any aggravating factors?

- Is there evidence of escalating behaviour?
- Are there any on line elements?
- Is it sexual harassment? If YES – refer to [Sexual harassment guidance](#)
- Are there any hate elements?
- What is the impact on the victim?
- What are the victims' wishes?

Theft – see flowchart

A person is guilty of theft if they dishonestly appropriate property belonging to another with the intention of permanently depriving the other of it.

Schools and colleges should take steps to establish what has happened and who is involved. The school or college would normally deal with such an incident internally unless there were aggravating factors present.

The following questions will support the school or college in the decision making process.

Are there any aggravating factors?

- Is the stolen goods of a high value? The definition of high value here is a professional judgment call to be made by the school
- Is there evidence of escalating behaviour? Or previous incidents of a similar nature?
- Have any threats or violence been used in the course of the theft?
 - What is the impact on the victim?
 - What are the victim's wishes?
 - Is there a hate element?



Weapons – see flowchart

An offensive weapon is any article which is made, intended or adapted to cause injury. Offensive weapon can be broken down into two categories:

a) Those that are made as an offensive weapon (e.g. knuckle-duster, dagger, gun) or adapted (e.g. broken bottle) for use for causing injury to the person; and

b) Weapons not made or adapted as an offensive weapon (e.g. kitchen knife, spanner, hammer) but intended by the person having in possession of it to cause injury to another

Possession of a weapon, particularly a knife on school or college premises is often an indicator of vulnerabilities for the young person concerned and therefore a multi-agency approach is important, instigated by a police referral. The school or college should not be expected to manage the situation in isolation.

School staff do have the power to search for weapons, using force as is reasonable in the circumstances. It is important that staff do not put themselves at risk.

Offences

Section 139A of the Criminal Justice Act 1988 creates the offence of possessing an article with a blade or sharp point or an offensive weapon on school premises.

Section 1 of the Prevention of Crime Act 1953 prohibits the possession in any public place of an offensive weapon without lawful authority or excuse.

Section 139 of the Criminal Justice Act 1988 prohibits having with you, in a public place any article which has a blade or is sharply pointed, (including a folding pocket knife if the cutting edge of its blade exceeds 7.62cm/3 inches)

139A(1) Any person who has an article to which section 139 of this Act applies with him on school premises shall be guilty of an offence.

139A(2) Any person who has an offensive weapon within the meaning of section 1 of the Prevention of Crime Act 1953 with him on school premises shall be guilty of an offence.

Defences

139A(3) It shall be a defence for a person charged with an offence under subsection (1) or (2) above to prove that he had good reason or lawful authority for having the article or weapon with him on the premises in question.

139A(4) Without prejudice to the generality of subsection (3) above, it shall be a defence for a person charged with an offence under subsection (1) or (2) above to prove that he had the article or weapon in question with him:-
(a) For use at work, (b) for educational purposes, (c) for religious reasons, or (d) as part of any national costume.

BB guns (plastic pellet guns)

The possession of these types of guns under legislation is not an offence as they are deemed to be toys. However, if from a school or college's perspective they breach school rules, they could be seized and retained under the Education Act.

If an item is found which is suspected to be a gun, and it cannot be ascertained whether it is a genuine firearm or a BB gun, it should always be treated as a firearm and the police called to make that decision.

Possession of these items becomes an offence when a person is misled into believing they are genuine firearms in order to provoke fear; the BB gun may then be classed as an imitation firearm. Circumstances giving rise to this belief may include use:

1. in connection with a robbery
2. To threaten someone
3. As a weapon to assault someone, e.g. pellet injures

Contacting the police

The presumption would be to contact the police unless in exceptional circumstances where there is a reasonable explanation or set of circumstance where it is obvious that a weapon or prohibited article has been brought into school or college as a genuine mistake.

The weapon should be seized and stored securely by the school.

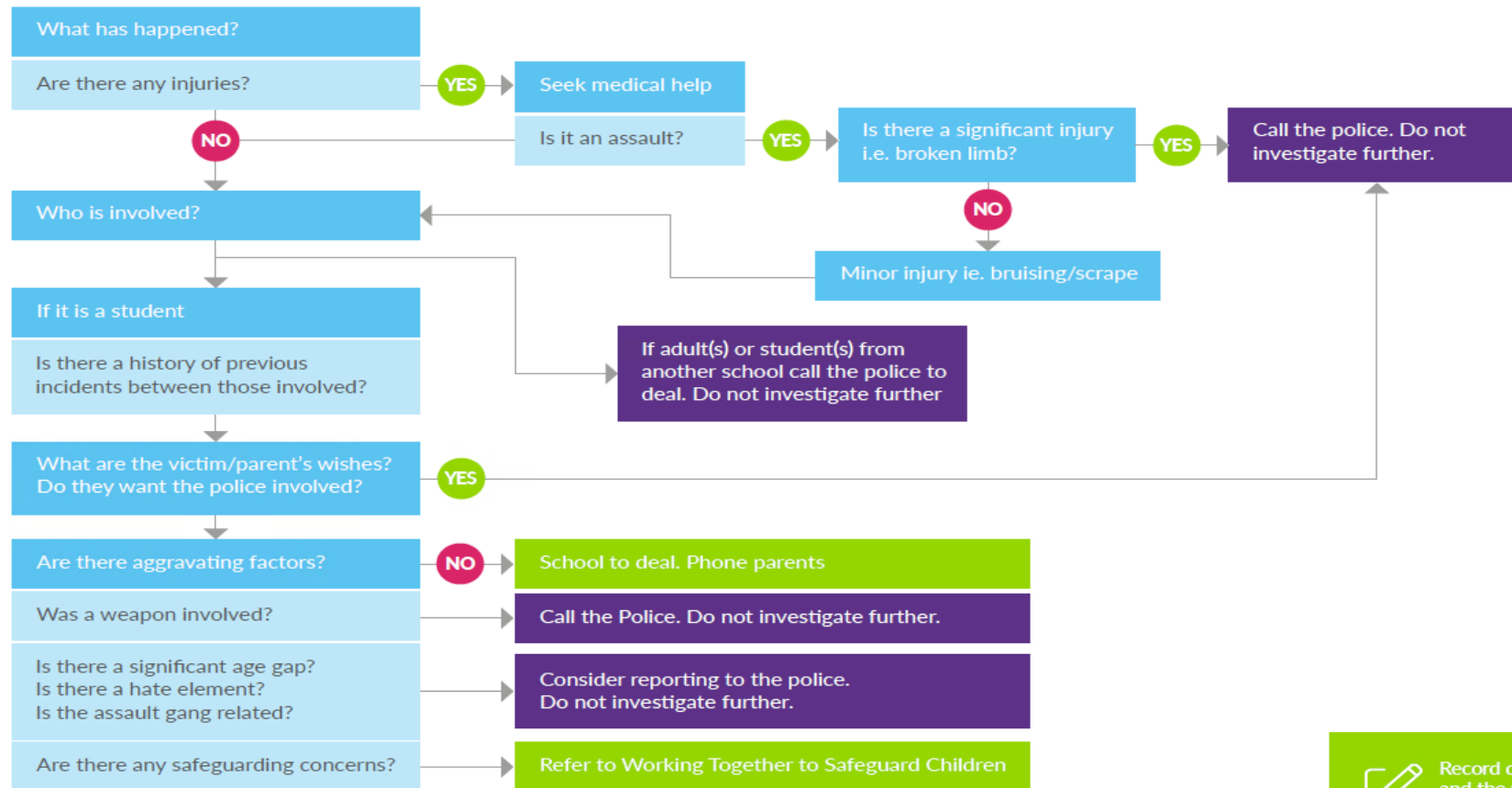
- Head teachers and staff authorised by them have the power to search students for offensive weapons, with their consent. They also have statutory power to search pupils or their possessions, without consent, where they have reasonable grounds for suspecting that the pupil may have an offensive weapon. Further information can be found [here](#)

Aggravating factors

Therefore as the police will be involved in most situations where a weapon is involved, the full circumstances relating to the incident will be investigated.

ASSAULTS

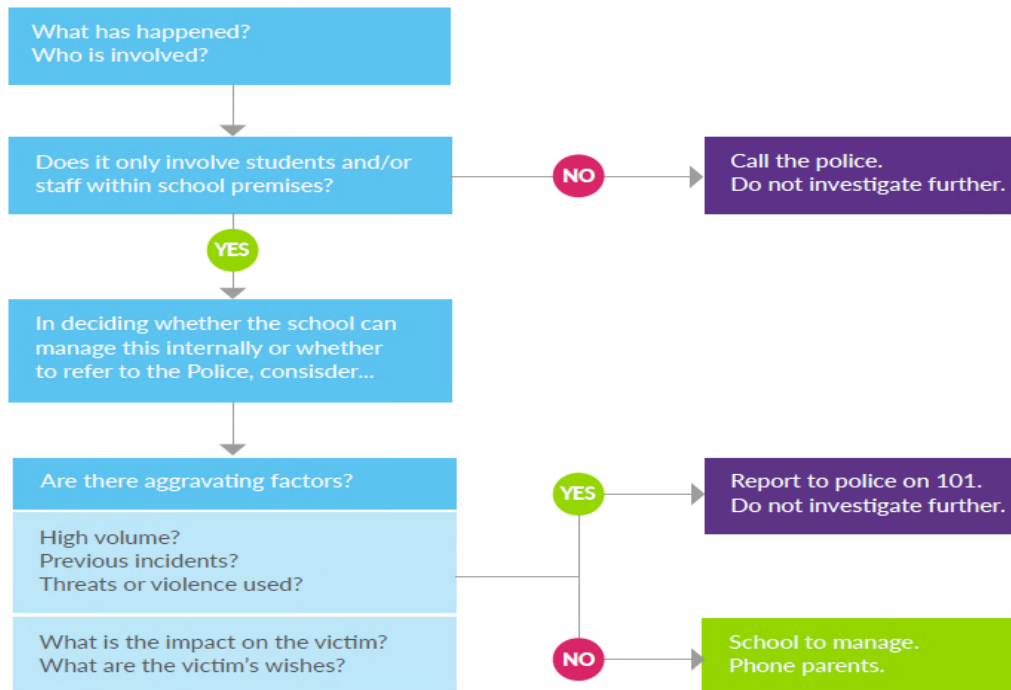
Definition: It is an act which intentionally or recklessly causes violence to another



Record decisions
and the reasons
for decisions

CRIMINAL DAMAGE INCLUDING ARSON

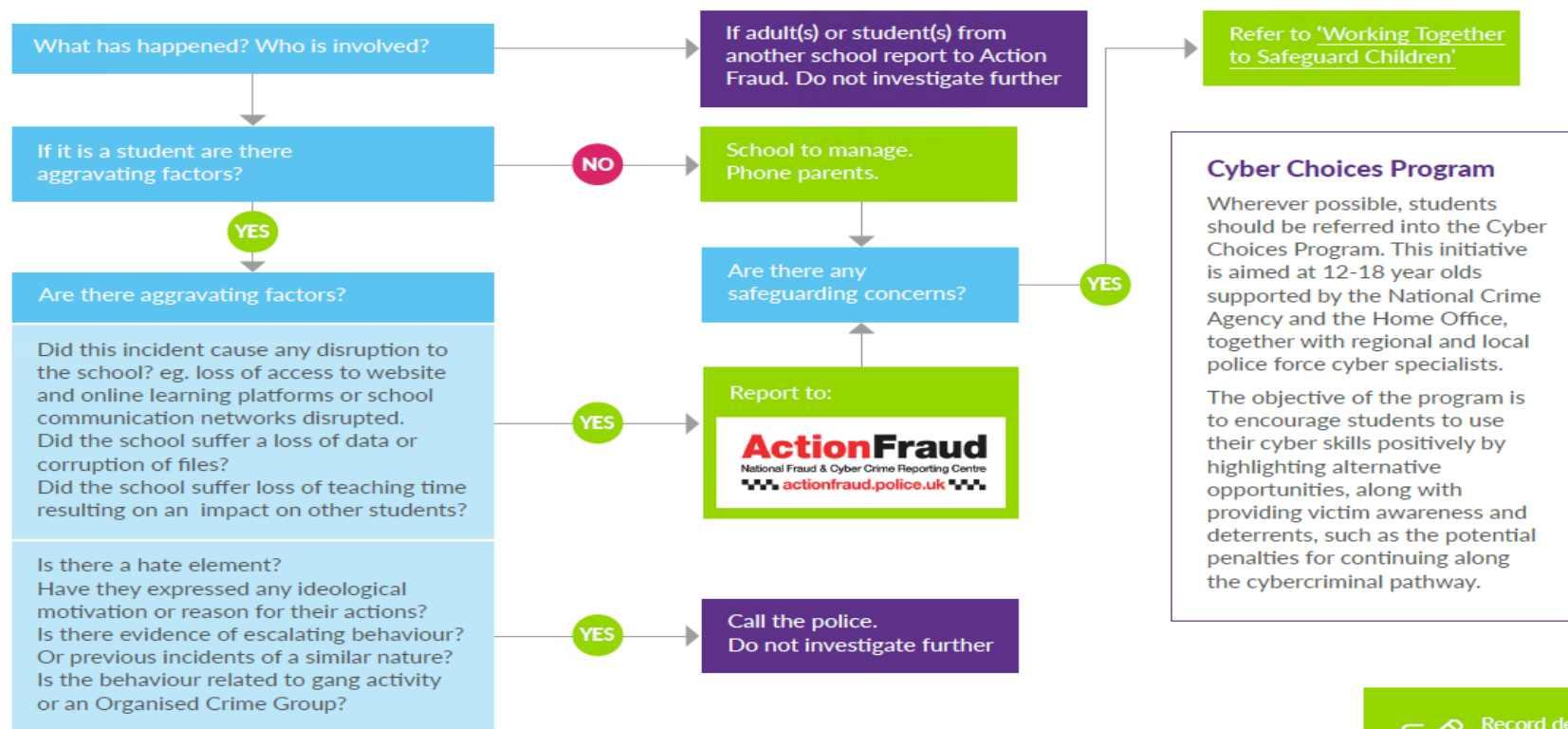
Definition: Criminal damage is the intentional and malicious damage to property or vehicles, including graffiti, or being reckless as to whether damage is caused. Arson is the act of deliberately setting fire to property, including buildings and vehicles.



Record decisions and the reasons for decisions

CYBER CRIME

Definition: Cyber Dependent Activity includes: Unauthorised access to computers, Denial of Service or other computer interference and impairment, Acts causing serious damage to or loss of data, 'Hacking'.



Cyber Choices Program

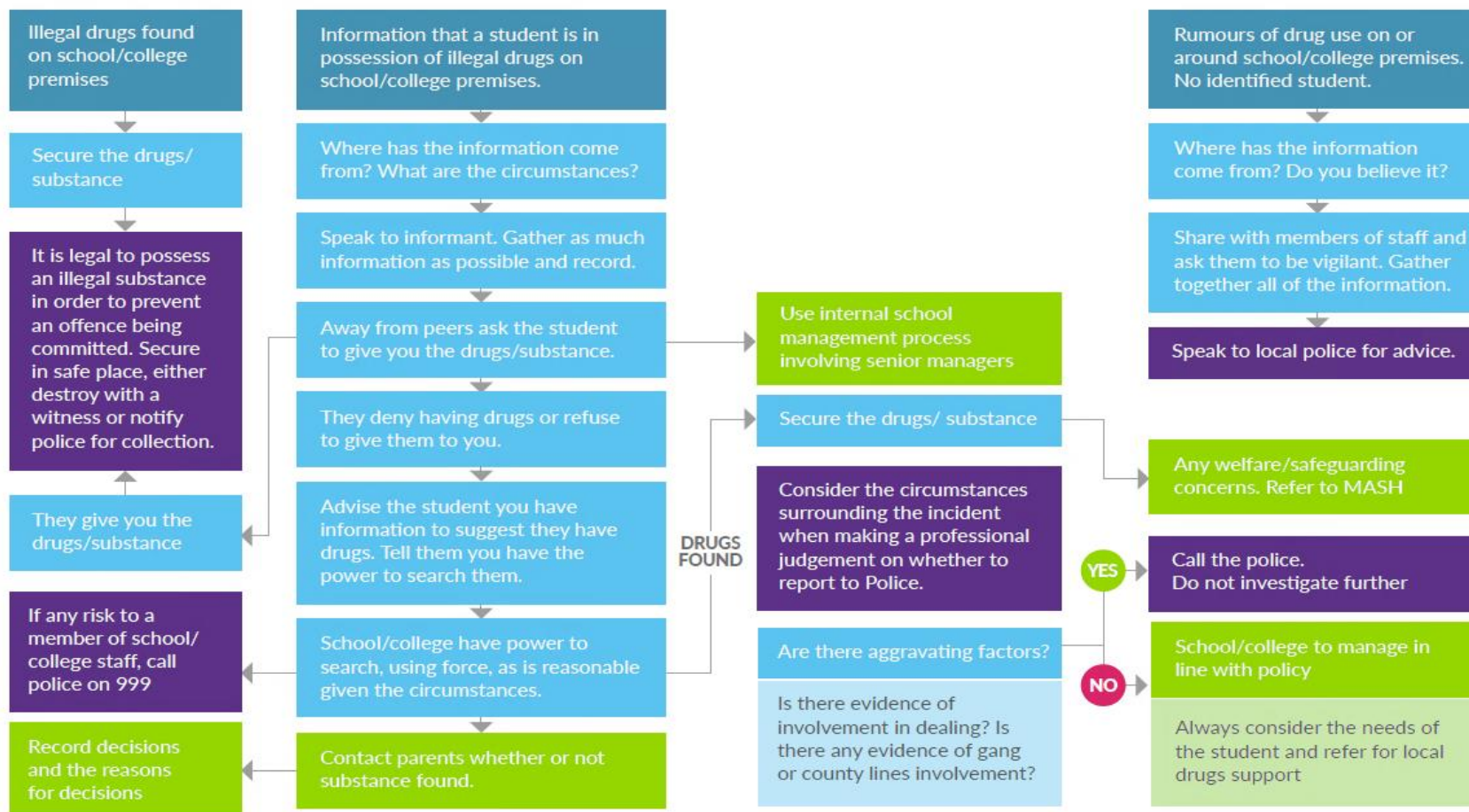
Wherever possible, students should be referred into the Cyber Choices Program. This initiative is aimed at 12-18 year olds supported by the National Crime Agency and the Home Office, together with regional and local police force cyber specialists.

The objective of the program is to encourage students to use their cyber skills positively by highlighting alternative opportunities, along with providing victim awareness and deterrents, such as the potential penalties for continuing along the cybercriminal pathway.

Record decisions and the reasons for decisions

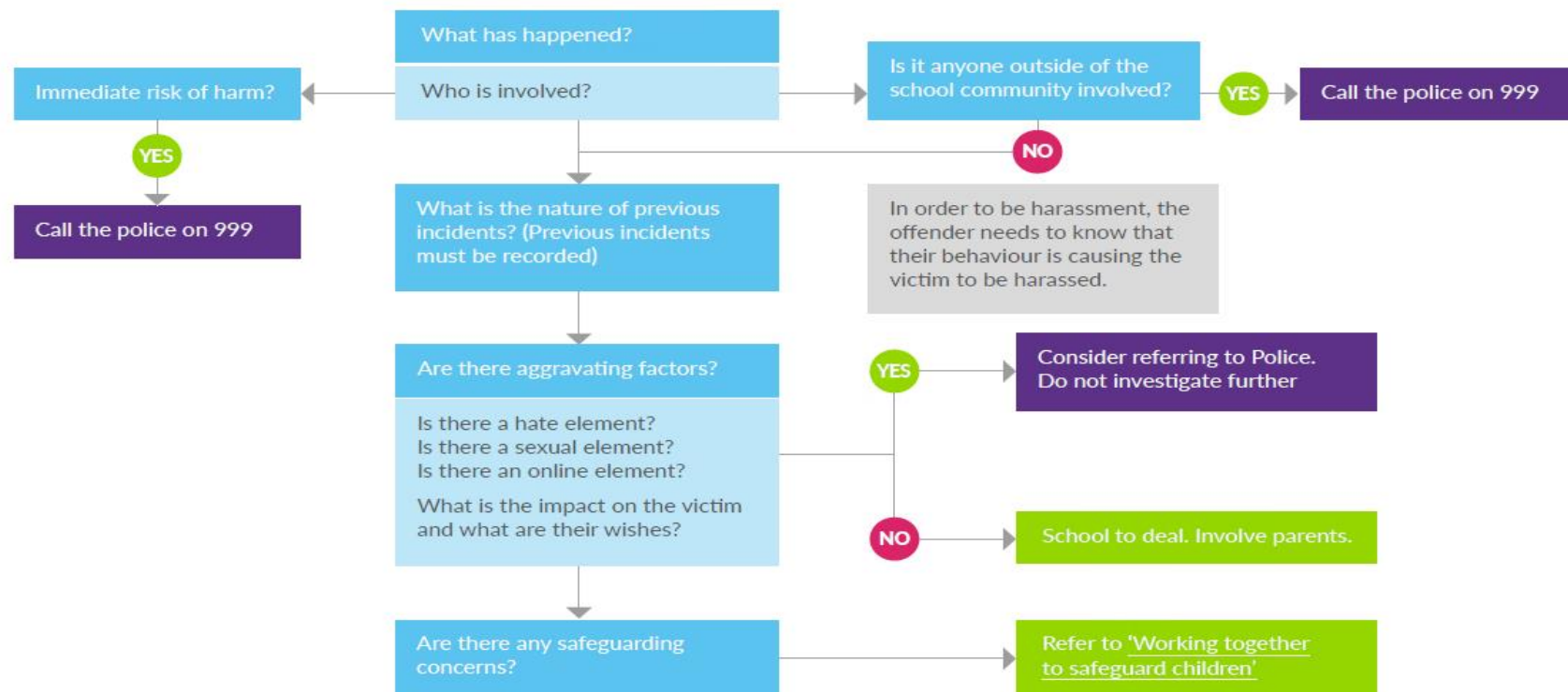
ILLEGAL DRUGS

Definition: Misuse of Drugs Act 1971: It is an offence for any person to unlawfully have a controlled drug in their possession. It is an offence to supply, or be concerned in the supply of a controlled drug. It is an offence to offer to supply, or be concerned in making an offer to supply a controlled drug.



HARASSMENT

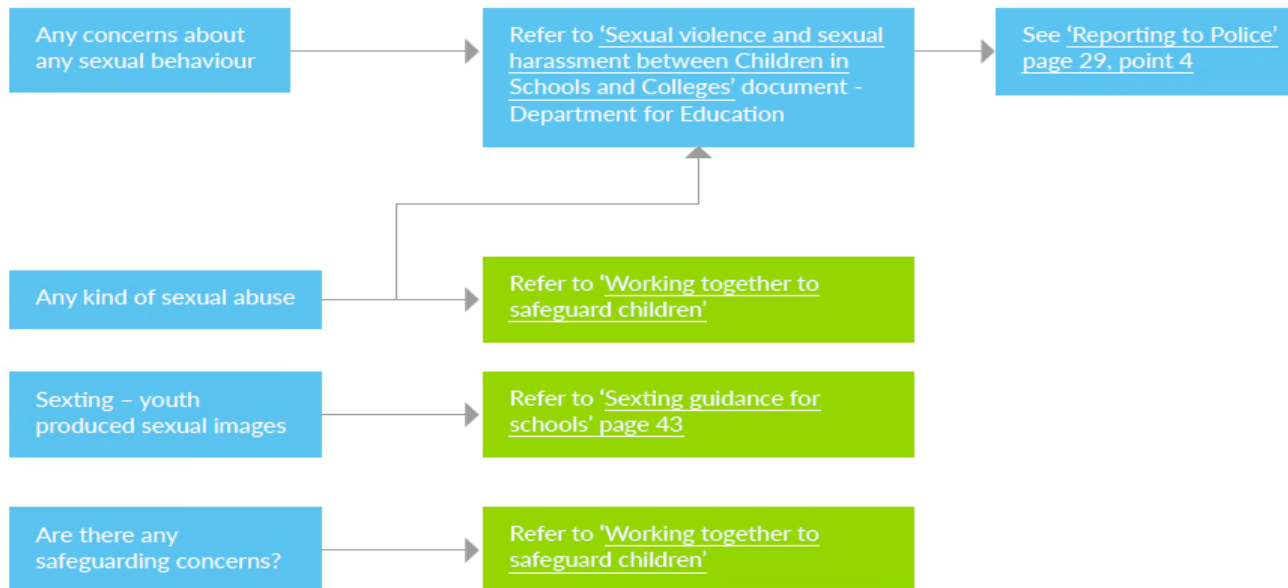
Definition: Causing alarm or distress or putting people in fear of violence, on more than one occasion (course of conduct) and the incidents are connected.



 Record decisions and the reasons for decisions

SEXUAL OFFENCE

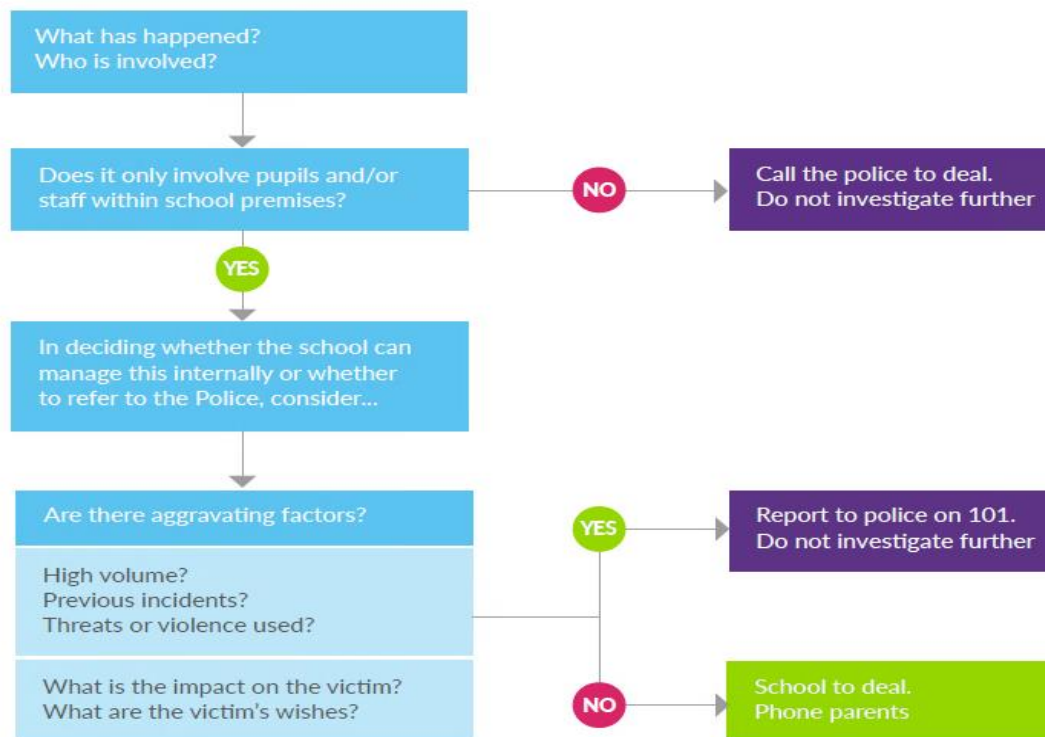
Definition: Any sexual contact with another person without that other person's consent. Generally speaking guidance on dealing with sexual offences is covered in working together to safeguard children. For incidents of rape or serious sexual assault call the police immediately.



Record decisions and the reasons for decisions

THEFT

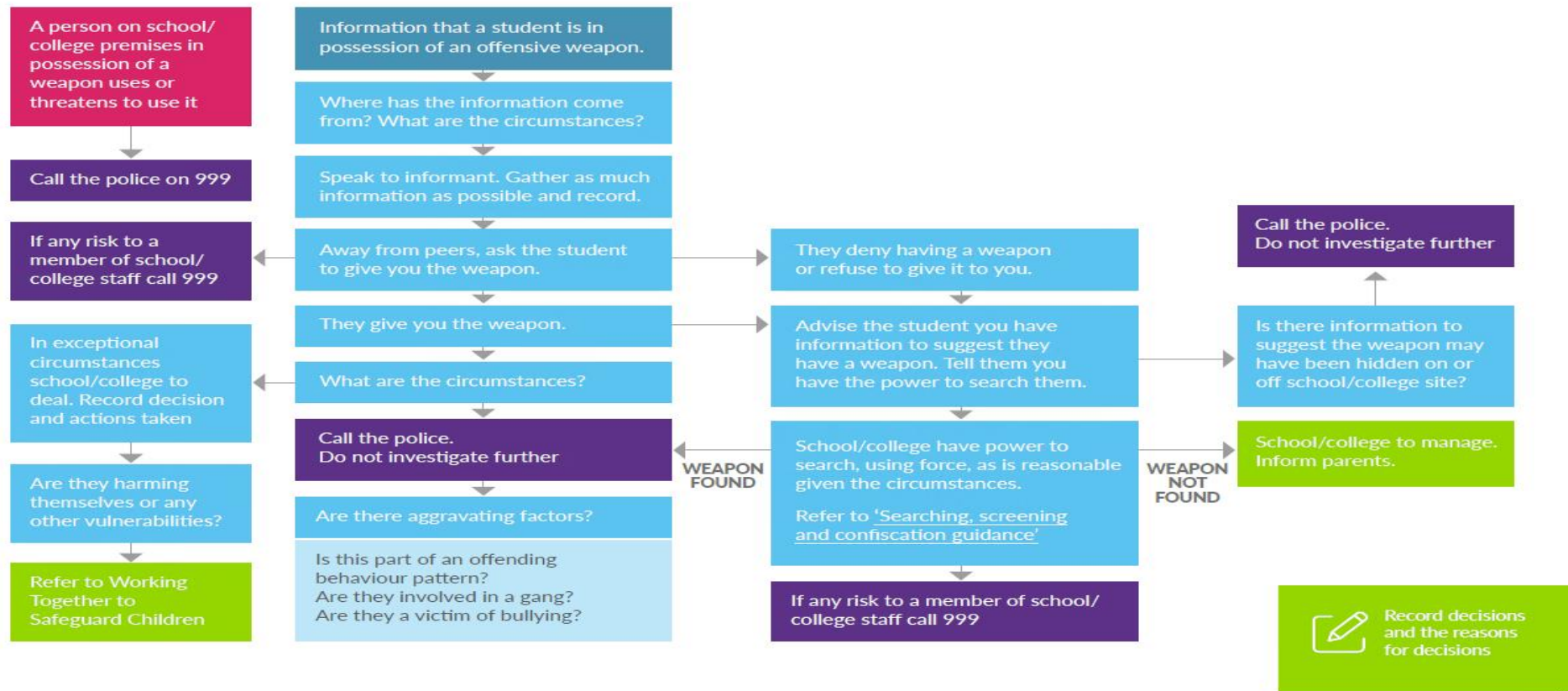
Definition: A person is guilty of theft if they dishonestly appropriate property belonging to another with the intention of permanently depriving the other of it.



 Record decisions
and the reasons
for decisions

WEAPONS

Definition: An offensive weapon is any article which is made, intended or adapted to cause injury. It is an offence to possess an offensive weapon or bladed or sharply pointed article on primary school or secondary school premises.





Appendix 7 Early Help Offer

At Goldington Academy, we recognise the importance of early help to offer support to meet the needs of students.

Early Help is everybody's responsibility: together we will make sure that children, young people and their families are safe, happy and ready for school, work and life's challenges. Effective Early Help will resolve problems before they become overwhelming and result in worry, stress, low self-esteem, poor attendance and lost learning time. Early Help enables children to be ready for school and more likely to achieve their full potential.

Form Tutor All students have an allocated Form Tutor who they see on a daily basis. The form tutor is their first point of contact for any issues, and parents also have email access to their child's tutor. In addition, there are scheduled parental meetings, but parents are encouraged to liaise more regularly as required. Tutors are responsible for overseeing the academic and pastoral wellbeing of their group, and liaising with other staff within the school as required to ensure that the appropriate support is in place as soon as a need is identified.

Head of Year All students have an allocated Head of Year who is responsible for the attendance, behaviour and pastoral support for pupils in their year group. Heads of Year can signpost students and families to support both in house and through outside agencies, for example through an Early Help Assessment.

Mental Health The school has an identified mental health lead who attends borough wide support groups and implements strategies/practices to promote and support good mental health amongst pupils in school.

All pupils complete the Strength and Difficulties Questionnaire every term during Life Skills. Results are then screened by the mental health lead and heads of year; pupils with high scores are referred for support either in house or through external agencies.

Mental Health assemblies are delivered to each year group on a half termly basis. The assemblies focus on topics within mental health and where pupils can go for support.

The school works closely with the CAMH schools programme and can make referrals to both CAMH and CHUMS.

Life Skills

A multitude of topics are taught through the Life Skills curriculum including:

- Keeping safe, personal safety
 - the danger of drug use
 - healthy lifestyles
 - relationships and sex
 - valuing difference
 - employability and enterprise
 - resilience and mental health
 - gender stereotyping, transphobia and discrimination
 - handling money
 - internet safety
 - pressures and risks.
-

Attendance Goldington Academy has excellent levels of attendance and expects pupils to meet the school's attendance targets.

The school has close links with Bedford Borough Education Welfare Service and works closely with the service to support pupils with school attendance.

Heads of Year routinely monitor the attendance of their year groups and take necessary action to improve attendance of pupils below the expected targets.

Pupil voice Goldington Academy runs a school council, which meets half termly with the Life Skills lead. Pupils on the council are pupil representatives who have been elected by their peers to represent them. The school council gives pupils an opportunity to discuss areas of the school that affect them.

Heads of year run half termly pupil monitoring discussions during which pupils from their year groups are chosen to discuss a number of areas relating to school life. This feedback forms a section of the safeguarding report, which is fed back to governor's half termly.

Curriculum leaders run half termly pupil monitoring discussions during which pupils' feedback their experiences of the curriculum to the relevant curriculum leader. This information is then fed back to SLT as appropriate.

Academic intervention A number of academic interventions are run at Goldington Academy and are targeted at students who may need extra support to reach their potential. Interventions include:

- Maths
 - English
 - Maths Power of 2
 - 1:2 reading groups using rapid reader texts
 - Lexia groups
 - Paired reading buddies
 - Registration reading comprehension
-

- Reading skills group

**Student
Support Hub**

The SSH is our in house pastoral support base, which is run by our pupil mentor. A range of interventions can be delivered to pupils through the SSH:

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Behaviour Management

Behaviour management is a whole school approach. It includes creating a positive environment for learning and uses strategies that encourage positive behaviour in schools. It also involves learning a range of strategies to reduce the chance of poor or aggressive behaviour.

Anxiety Management

Anxiety is a feeling of unease, such as worry or fear that can be mild or severe. Feelings of anxiety can be more constant and can often affect daily lives. Anxiety is the main symptom of several conditions, including: panic disorder and phobias. This intervention can help you to find ways to understand and manage your anxiety.

**Student
Support Hub**

Behaviour online

Behaviour on line is an interactive program that teaches pupils how to best behave in different situations. It shows how their behaviour can have a negative effect on others, and how it can make people feel.

Self-Harm

Self-harm can be a way of coping with problems. It may help children express feelings they can't put into words, distract them from their life, or release emotional pain. Afterwards, they probably feel better—at least for a little while. But then the painful feelings return and the urge to hurt returns again. Strategies and distraction techniques can be learnt or taught to help pupils to stop hurting themselves.

Bereavement

Adults and children grieve differently, and the grief of children can take many different forms, based on the child's current age and developmental level. By understanding how children perceive death, how they might react, and how adults can help, we can provide a safe environment for a child to grieve and begin to heal.

Play therapy

Play therapy is a form of counselling in which play is used as a means of helping children express or communicate their feelings. Some children can find it very difficult to express how they are feeling. Sometimes telling a story using toys can be easier.

Cognitive Behaviour Therapy

Cognitive Behaviour Therapy (CBT) is a talking therapy that can help you manage your problems by changing the way you think and behave. CBT aims to help you deal with overwhelming problems in a more positive way by breaking them down into smaller parts. You're shown how to change these negative patterns to improve the way you feel.

Critical Thinking

Critical thinking is clear, rational, logical, and independent thinking. It is about improving thinking by analysing, assessing, and reconstructing how we think. It also means thinking in a self-regulated and self-corrective manner. This resource focuses on developing positive relationships with friends, family members, neighbours and any other people you may encounter in your life.

Critical thinking involves mindful communication, problem-solving, and a freedom from bias or egocentric tendency. You can apply critical thinking to any kind of subject, problem, or situation you choose.

Healthy Relationships

Healthy relationships intervention focuses on developing positive relationships with friends, family members, neighbours and any other people we may encounter in our lives.

What makes a Healthy Relationship?

Respect each person as an individual. A healthy partnership means learning about the other person & valuing what's important to them.

Trust means that you feel that you can count on each other & that the other person will be there for you. Communication is how we show our respect, trust and honesty. It requires listening and sharing thoughts and feelings.

Student

Support Hub

Emotional resilience

Emotional resilience is the ability to adapt to stressful situations and cope with life's ups and downs. ... Whilst resilient people do not allow adversity to define them or their lives and are able to 'roll with the punches', less resilient people have a harder time with stress and life changes.

Protective Behaviours

Protective Behaviours intervention develops personal safety skills that can be used by children, young people and adults to keep them safe in many different ways, from strangers and bullies to internet safety.

Friendships

True friendship is when someone knows you better than yourself and takes a position in your best interests in a crisis. Friendship goes beyond just sharing time together, and it is long lasting. Friendships can be tough and sometimes they are hard to hold onto. We may not be quite sure how to approach people we would like to be friends with. I can help with this.

Drawing and Talking

Drawing and Talking can be used with pupils of all ages to help with underlying emotional difficulties that may be affecting their learning and behaviour. Painful memories, charged with high levels of emotion, are stored in visual form in the right

brain and are expressed in symbolic form in the child's drawings. It is an effective way of expressing your feelings.

Kidscape Anti-bullying workshop

Young people are at risk of experiencing bullying on a daily basis. A ZAP workshop offers practical assertiveness skills so that young people are able to deal with bullying situations effectively.

This is a half day workshop with the following objectives:

Raising self-esteem. Teaching young people how to identify and be proud of their own unique strengths and skills - encouraging them to understand that the bullying is not their fault.

Exploring bullying roles. Defining the terms 'bully', 'bystander' and 'target', and exploring the types of behaviour that may be associated with these terms.

Assertive skills. Understanding the difference between aggression, assertiveness and passivity and how these are relevant to bullying dynamics. Young people will also learn a range of practical assertive strategies that will help them to deal with bullying situations that may occur in the future.

Positive body language. Identifying the impact of positive body language in relation to being assertive.

Open door

Bedford Open Door provides free, confidential counselling for young people living in Bedford Borough and some parts of Central Beds, aged 13-25 years. Counselling takes place at the Bedford Open Door premises in Bedford.

Pupils can access this via telephone in the SSH.

**Student
Support Hub****Kooth**

www.kooth.com is an online wellbeing service, run in partnership with the NHS and recognised by the BACP (British Association for Counselling and Psychotherapy), and students can be referred to access support here after assessment by a learning mentor.

Social and Emotional worries

Social development involves learning the values, knowledge and skills that enable children to relate to others effectively and to contribute in positive ways to family, school and the community. Emotional development is a complex task that begins in infancy and continues into adulthood. The first emotions that can be recognised in babies include joy, anger, sadness and fear. Later, as children begin to develop a sense of self, more complex emotions like shyness, surprise, elation, embarrassment, shame, guilt, pride and empathy emerge. Sometimes we do not know how to show or understand these emotions and need some help.

Show racism the red card

This intervention is used to challenge the perceptions of students who may have used racist language or acted in a way that causes offence to members of the school, whether knowingly or unknowingly.

CSE

The school uses the CSE risk assessment tool to identify students who may be at potential risk of CSE. This risk assessment would then be used in conjunction with other interventions and referrals to outside agencies.

SEND**Dyslexia checklist**

This checklist only provides an indicator as to whether a student is presenting with dyslexic-type tendencies - the formal diagnosis of dyslexia is generally undertaken by an educational psychologist or a specialist teacher who has obtained additional qualifications in this area. Ideally, the checklist is completed collaboratively by two or more staff.

Dyslexia screener

GL Assessment dyslexia screener that allows us to ascertain whether there are any underlying dyslexia type needs that a student has. It is not a fully-fledged test but an indicator that can then allow for intervention to take place.

ADHD checklist

Checklist that allows for informal screening of ADHD to see if it appears to "fit" the student. It is not a diagnosis but simply trying to determine if it would be useful to refer the student onto professionals who are in a position to make an identification of ADHD and suggest appropriate responses (which may include medication). Ideally, the checklist is completed collaboratively by two or more staff.

ASD initial checklist

Autistic Spectrum Disorder is complex and encompasses a significant array of difference between individual cases. This checklist only provides a 'first step' in the identification process. The indicators listed would normally be expected to be present across social contexts and not simply confined to the school setting. Formal identification will require the involvement of the student's family / carers and specialist professionals. Ideally, the checklist is completed collaboratively by two or more staff.

SEND**Dyspraxia checklist**

This checklist only provides an indicator as to whether a student is experiencing difficulties associated with dyspraxia. An educational psychologist, occupational therapist or speech therapist will usually undertake the formal diagnosis of dyspraxia and suggest strategies to support the student. Dyspraxia is closely related to other specific learning difficulties and so a broader assessment for Special Educational Needs is often required should they be identified as presenting with

dyspraxia-type difficulties. Ideally, the checklist is completed collaboratively by two or more staff.

Interventions:

Pupil progress is reviewed in English and maths half termly. If an intervention has been put in place for a pupil, it will be reviewed following the intervention. Progress towards a pupils target is measured at this time and a decision to maintain, alter or change an intervention is made depending on the impact the intervention has had. This follows the 'Assess, Plan, Do, Review' guidance from the SEND Code of Practice 2014.

Some interventions are organised and carried out within the classroom by the teacher or support teacher during the lesson. Other interventions are undertaken outside the main classroom in one-to-one or small group situations. These are overseen by the SENDCO and SENDCO Assistants and the impact is measured by the learning support assistant and the SENDCO.

Interventions are varied and are matched to the pupil's need. They include activities such as:

- Individual daily reading with an adult
- Small group phonic teaching
- Additional reading programmes
- Individual coaching in maths with Power of 2
- Individual Literacy tuition
- Individual Maths tuition
- Reading comprehension
- Soundwrite
- Lexia
- SEND SATS support
- SEND GCSE support
- Specific Learning Difficulties (SPLD) support
- Working memory support groups
- Dyslexia support groups

Educational Psychology Service (Bedford Borough Council)

Where in-house provision, support and interventions are deemed to be not supporting pupil progress, support from Bedford Borough is sought (via their Early

Help Service) through a cognitive assessment. After referral through an Early Help Assessment, the application is then triaged, and a formal educational psychologist assessment is undertaken. Parents form a core part of this student-centred approach and feedback from the educational psychologist is delivered to the SENDCO and parents to allow for effective home-school support. Additionally, access to an educational psychology drop in session (on an appointment basis) is also included as part of our SEN provision.

School nurse The school nurse visits school once a week and is able to see students on a referral or drop in basis. This could be at the request of the school/parents or at the request of students.

Young carer support Bedfordshire Young Carers work with the school to support pupils who care for people in their lives who need support. Young carers offer assemblies and information to the school and to pupils and Goldington Academy is able to make direct referrals to Bedfordshire Young Carers.

Extra – curricular clubs There are a vast variety of extra-curricular clubs on offer throughout the school year, including a variety of sports clubs and academic clubs.

For example:

Cricket	DT catchup
Rugby	Parkour
Football	Composing club
Rounders	
Hockey	
Journalism	
Stem club	

*Please see the full list

Fun Friends club The Fun Friends Club is run by an SEND Support Assistant and is targeted to support our most vulnerable pupil through lunchtime each day.

Risers Risers club is a breakfast club that children are invited to support their arrival to school in a morning before academic intervention begin.

More Able

A number of opportunities are on offer to G&T pupils across the school. The aim of these opportunities is to provide challenge of thinking and depth of learning to pupils outside of a classroom setting. Some of the opportunities on offer are:

National Young Mathematician of the Year

UKMT Junior Maths challenge

UKMT team challenge

UOB Science seminars

CSI day

Theatre visits

Beginners Italian club

Beginners German club

Family STEM evening

The Brilliant Club

CERN residential

Psychology/Philosophy club

Battlefields residential trip

Robotics club

Jaguar visit

Abstract Art Workshops

*Please see the full list

Thank you for your visit to Goldington Academy, contact details below:

Goldington Academy
Haylands Way,
Bedford
MK41 9BX
01234 261516
office@goldington.beds.sch.uk

Mr. Francis Galbraith Principal

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Code of Conduct & Safeguarding Information for Visitors

Please refer to this leaflet for code of behavior or safeguarding concerns during or following your visit to the school site.

Code of Behaviour		Procedure
Do	treat everyone with respect.	Designated Safeguarding Lead – Will Atkinson Deputy DSL- Anthea Jones in their absence please refer to the Principal.
Do	provide an example you wish others to follow.	
Do	plan activities so that they involve more than one person or at least are in sight or hearing of others.	
Do	respect a young person's right to personal privacy.	
Do	provide access for young people and adults to feel comfortable enough to point out attitudes or behaviours they do not like, and try to provide a caring atmosphere.	If you suspect that a child / young person is being abused: • Immediately tell the DSL / Principal • Record the known facts and give them to the above person.
Do	remember that someone else might misinterpret your actions, no matter how well intentioned.	
Do	act as an appropriate adult role model.	
Do not	play physical contact games, make inappropriate comments, or have inappropriate verbal banter with young people.	If a child or young person tells you he / she is being abused: • Allow him/her to speak without interruption, accepting what is said; • Advise him/her that you will offer support, but that you MUST pass information on to the Child DSL / Principal • Immediately tell the designated DSL / Principal • Record the facts as you know them, including the account given to you by the young person and give a copy to the DSL / Principal
Do not	jump to conclusions without checking facts.	
Do not	make suggestive remarks /gestures or tell sexist /homophobic /racist jokes'.	
Do not	rely on your good name to protect you. It may not be enough.	
Do not	believe it could not happen to you. It could.	

Appendix 8 Operation Encompass Letter



Engaging minds. Nurturing success. Inspiring futures.

Haylands Way, Bedford MK41 9BX

Telephone: 01234 261516

e-mail: office@goldington.beds.sch.uk

Website: www.goldington.beds.sch.uk

Principal: Mr. Francis Galbraith BSc (Hons), NPQH, MBA

November 2021

Parent/Carer

The school has been given the opportunity to take part in a project that will run jointly between schools, Bedford Borough Council and Bedfordshire Police.

Operation Encompass is the reporting to schools, prior to the start of the next school day, when a child or young person has experienced or been exposed to any domestic abuse.

Operation Encompass will ensure that a member of the school staff, known as a Key Adult, is trained to allow them to liaise with the police and to use the information that has been shared, in confidence, while ensuring that the school is able to make provision for possible difficulties experienced by children, or their families, who have been experienced a domestic abuse incident.

We are keen to offer the best support possible to all our pupils and we believe this will be extremely beneficial for all those involved.

Yours sincerely

Francis Galbraith
Principal

Appendix 9 Retention Schedule

Retention Schedule

Pupil / Student Management (inc child protection, SEN & educational visits)				
Basic file description	Data Protection	Statutory Provisions	Retention Period	Action at the end of the administrative life of the
Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005 PAPER RECORDS	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437	Retain whilst the child remains at the primary school If pupil moves to another school the file should follow the pupil If pupil leaves but does not move to another school, file retained for Date of Birth of the pupil +25 Years	The file should follow the pupil when he/she leaves the primary school. This will include: • to another primary school • to a secondary school • to a pupil referral unit • If the pupil dies whilst at primary school the file should be returned to the Local Authority to be retained for the statutory retention period. If the pupil transfers to an independent school, transfers to home schooling or leaves the country the file should be returned to the Local Authority to be retained for the statutory retention period. Primary Schools do not ordinarily have sufficient storage space to store records for pupils who have not transferred in the normal way. It makes more sense to transfer the record to the Local Authority as it is more likely that the pupil will request the record from the Local Authority
Pupil's Educational Records required by The Education (Pupil Information) (England) Regulations 2005 PAPER & ELECTRONIC RECORDS	Yes	Limitation Act 1980 (Section 2)	Date of Birth of the pupil +25 Years	SECURE DISPOSAL

Special Educational Need				
Special Educational Needs files, reviews and Individual Education Plans	Yes	Limitation Act 1980 (Section 2)	Date of Birth of the pupil + 25 years	REVIEW NOTE: This retention period is the minimum retention period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time to defend themselves in a “failure to provide a sufficient education” case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period and this
Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL unless the document is subject to a legal hold
Advice and information provided to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 2	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL unless the document is subject to a legal hold
Accessibility Strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL unless the document is subject to a legal hold

Curriculum				
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Curriculum returns	No		Current year + 3 years	SECURE DISPOSAL
Examination Results (Schools Copy)	Yes		Current year + 6 years	SECURE DISPOSAL
SATS records – Results	Yes			
			The SATS results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years. The school may wish to keep a composite record of all the whole year SATs results. These could be kept for current year + 6 years to allow suitable comparison	SECURE DISPOSAL
Examination Papers			The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL
Published Admission Number (PAN) Reports	Yes		Current year + 6 years	SECURE DISPOSAL
Value Added and Contextual Data	Yes		Current year + 6 years	SECURE DISPOSAL
Self Evaluation Forms	Yes		Current year + 6 years	SECURE DISPOSAL
Schemes of Work	No		Current year + 1 year	

Timetable	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period or SECURE DISPOSAL
Class Record Books	No		Current year + 1 year	
Mark Books	No		Current year + 1 year	
Record of homework set	No		Current year + 1 year	

Pupils' Work	No		Where possible pupils work should be returned to the pupil at the end of the academic year if this is not the school's policy then current year + 1 year	SECURE DISPOSAL
Extra-curricular Activities				
Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Primary Schools	No	Outdoor Education Advisers' Panel National Guidance Website http://oeapng.info specifically Section 3 - "Legal Framework and Employer Systems" and Section 4 - "Good Practice".	Date of visit + 14 years	SECURE DISPOSAL
Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Secondary Schools	No	Outdoor Education Advisers' Panel National Guidance Website http://oeapng.info specifically Section 3 - "Legal Framework and Employer Systems" and Section 4 - "Good Practice".	Date of visit + 10 years	SECURE DISPOSAL
Parental consent forms for school trips where there has been no major incident	Yes		Conclusion of the trip	Although the consent forms could be retained for DOB + 22 years, the requirement for them being needed is low and most schools do not have the storage capacity to retain every single consent form issued by the school for this period of time.
Parental permission slips for school trips – where there has been a major incident	Yes	Limitation Act 1980 (Section 2)	DOB of the pupil involved in the incident + 25 years The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils	

Walking Bus Registers	Yes		Date of register + 3 years This takes into account the fact that if there is an incident requiring an accident report the register will be submitted with the accident report and kept for the period of time required for accident reporting	SECURE DISPOSAL [If these records are retained electronically any back up copies should be destroyed at the same time]
Family Liaison Officers and Home School Liaison Assistants				
Day Books	Yes		Current year + 2 years then review	
Reports for outside agencies - where the report has been included on the case file created by the outside agency	Yes		Whilst child is attending school and then destroy	
Referral forms	Yes		While the referral is current	
Contact data sheets	Yes		Current year then review, if contact is no longer active then destroy	
Contact database entries	Yes		Current year then review, if contact is no longer active then destroy	
Group Registers	Yes		Current year + 2 years	

Admissions Process				
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
All records relating to the creation and implementation of the School Admissions' Policy	No	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014	Life of the policy + 3 years then review	SECURE DISPOSAL
Admissions – if the admission is successful	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014	Date of admission + 1 year	SECURE DISPOSAL
Admissions – if the appeal is unsuccessful	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014	Resolution of case + 1 year	SECURE DISPOSAL

Register of Admissions	Yes	School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities October 2014	Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made. ³	REVIEW Schools may wish to consider keeping the admission register permanently as often schools receive enquiries from past pupils to confirm the dates they attended the school.
Admissions – Secondary Schools – Casual	Yes		Current year + 1 year	SECURE DISPOSAL
Correspondence relating to authorized absence		Education Act 1980 (Section 2)	Current academic year + 2 Years	SECURE DISPOSAL
Proofs of address supplied by parents as part of the admissions process	Yes	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014	Current year + 1 year	SECURE DISPOSAL
Supplementary Information form including additional information such as religion, medical conditions etc	Yes			
For successful admissions			This information should be added to the pupil file	SECURE DISPOSAL
For unsuccessful admissions			Until appeals process completed	SECURE DISPOSAL

Governing Body				
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Agendas for LGB meetings	If meeting is dealing with confidential issues relating to Staff.		One copy should be retained with the master set of minutes. All other copies can be disposed of	Secure disposal
Minutes of Governing Body meetings	There may be data protection issues if the meeting is dealing with confidential issues relating to staff			
Principal Set (signed minutes)			PERMANENT	If the school is unable to store these then they should be offered to the County Archives Service
Inspection copies (this may include copies the Clerk wishes to retain for requesters)			Date of meeting + 3 years	If these minutes contain any sensitive, personal information they must be shredded.
Reports presented to the Governing Body	There may be data protection issues if the report deals with confidential issues relating to staff		Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports then the reports should be kept permanently	SECURE DISPOSAL or retain with the signed set of the minutes
Meeting papers relating to the annual parents' meeting held under section 33 of the Education Act 2002	No	Education Act 2002, Section 33	Date of the meeting + a minimum of 6 years	SECURE DISPOSAL
Instruments of Government including Articles of Association	No		PERMANENT	These should be retained in the school whilst the school is open and then offered to County Archives Service when the school closes.

Trusts and Endowments managed by the Governing Body	No		PERMANENT	These should be retained in the school whilst the school is open and then offered to County Archives Service when the school closes.
Action plans created and administered by the Governing Body	No		Life of the action plan + 3 years	SECURE DISPOSAL
Policy documents created and administered by the Governing Body	No		Life of the policy + 3 years	SECURE DISPOSAL
Records relating to complaints dealt with by the Governing Body	Yes		Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes	SECURE DISPOSAL
Annual Reports created under the requirements of the Education (Governor's Annual Reports)(England) (Amendment) Regulations 2002	No	Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 SI 2002 No 1171	Date of report + 10 years	SECURE DISPOSAL
Proposals concerning the change of status of a maintained school including Specialist Status Schools and Academies	No		Date proposal accepted or declined + 3 years	SECURE DISPOSAL

Headteacher and Senior Management Team

Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Log books of activity in the school maintained by the Head Teacher	There may be data protection issues if the log book refers to individual pupils or members of staff		Date of last entry in the book + a minimum of 6 years then review	These could be of permanent historical value and should be offered to the County Archives Service if appropriate
Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies	There may be data protection issues if the minutes refers to individual pupils or members of staff		Date of the meeting + 3 years then review	SECURE DISPOSAL
Reports created by the Head Teacher or the Management Team	There may be data protection issues if the report refers to individual pupils or members of staff		Date of the report + a minimum of 3 years then review	SECURE DISPOSAL
Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the records refer to individual pupils or members of staff		Current academic year + 6 years then review	SECURE DISPOSAL
Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the correspondence refers to individual pupils or members of staff		Date of correspondence + 3 years then review	SECURE DISPOSAL
Professional Development Plans	Yes		Life of the plan + 6 years	SECURE DISPOSAL
School Development Plans	No		Life of the plan + 3 years	SECURE DISPOSAL

Operational Administration				
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
General file series	No		Current year + 5 years then REVIEW	SECURE DISPOSAL
Records relating to the creation and publication of the school brochure or prospectus	No		Current year + 3 years	STANDARD DISPOSAL
Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year	STANDARD DISPOSAL
Newsletters and other items with a short operational use	No		Current year + 1 year	STANDARD DISPOSAL
Visitors' Books and Signing in Sheets	Yes		Current year + 6 years then REVIEW	SECURE DISPOSAL
Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	No		Current year + 6 years then REVIEW	SECURE DISPOSAL
CCTV	Yes		Recording time plus 75 days	SECURE DISPOSAL

Human Resources				
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
All records leading up to the appointment of a new Principal	Yes		Date of appointment + 6 years	SECURE DISPOSAL
All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes		Date of appointment of successful candidate + 6 months	SECURE DISPOSAL
All records leading up to the appointment of a new member of staff – successful candidate	Yes		All the relevant information should be added to the staff personal file (see below) and all other information retained for 6 months	SECURE DISPOSAL
Pre-employment vetting information – DBS Checks	No	DBS Update Service Employer Guide June 2014: Keeping children safe in education. July 2015 (Statutory Guidance from Dept. of Education) Sections 73, 74	The school does not have to keep copies of DBS certificates. If the school does so the copy must NOT be retained for more than 6 months	
Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure	Yes		Where possible these should be checked and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation then this should be placed on the member of staff’s personal file	

Pre-employment vetting information – Evidence proving the right to work in the United Kingdom ⁴	Yes	An employer’s guide to right to work checks [Home Office May 2015]	Where possible these documents should be added to the Staff Personal File [see below], but if they are kept separately then the Home Office requires that the documents are kept for termination of Employment plus not less than two years	
Staff Personal File	Yes	Limitation Act 1980 (Section 2)	Termination of Employment + 6 years	SECURE DISPOSAL
Timesheets	Yes		Current year + 6 years	SECURE DISPOSAL

Annual appraisal/ assessment records	Yes		Current year + 5 years	SECURE DISPOSAL
Allegation of a child protection nature against a member of staff including where the allegation is unfounded ⁵	Yes	“Keeping children safe in education Statutory guidance for schools and colleges March 2015”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015”	Until the person’s normal retirement age or 10 years from the date of the allegation whichever is the longer then REVIEW. Note allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned	SECURE DISPOSAL These records must be shredded
Disciplinary Proceedings	Yes			
oral warning			Date of warning ⁶ + 6 months	SECURE DISPOSAL [If warnings are placed on personal files then they must be weeded from the file]
written warning – level 1			Date of warning + 6 months	
written warning – level 2			Date of warning + 12 months	
final warning			Date of warning + 18 months	
case not found			If the incident is child protection related then see above otherwise dispose of at the conclusion of the case	SECURE DISPOSAL

Health & Safety				
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Health and Safety Policy Statements	No		Life of policy + 3 years	SECURE DISPOSAL
Health and Safety Risk Assessments	No		Life of risk assessment + 3 years	SECURE DISPOSAL
Health and Safety Risk Assessments (Pupil or staff specific risk assessment that contain personal data)	Yes	Management of Health Safety at Work regulations 1999	Adult Life of the risk assessment + 3 years DOB of child + 21 years	SECURE DISPOSAL
Records relating to accident/injury at work	Yes		Date of incident + 12 years In the case of serious accidents a further retention period will need to be applied	SECURE DISPOSAL
Accident Reporting	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980		
Adults			Date of the incident + 6 years	SECURE DISPOSAL
Children			DOB of the child + 25 years	SECURE DISPOSAL

Control of Substances Hazardous to Health (COSHH)	No	Control of Substances Hazardous to Health Regulations 2002. SI 2002 No 2677 Regulation 11; Records kept under the 1994 and 1999 Regulations to be kept as if the 2002 Regulations had not been made. Regulation 18 (2)	Current year + 40 years	SECURE DISPOSAL
Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action + 40 years	SECURE DISPOSAL
Process of monitoring of areas where employees and persons are likely to have become in contact with radiation	No		Last action + 50 years	SECURE DISPOSAL
Fire Precautions log books	No		Current year + 6 years	SECURE DISPOSAL
Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	Current year + 3 years	SECURE DISPOSAL
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		Current year + 6 years	SECURE DISPOSAL

Financial Management				
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Employer's Liability Insurance Certificate	No		Closure of the school + 40 years	SECURE DISPOSAL
Asset Management				
Inventories of furniture and equipment	No		Current year + 6 years	SECURE DISPOSAL

Burglary, theft and vandalism report forms	No		Current year + 6 years	SECURE DISPOSAL
Accounts and Statements including Budget Management				
Annual Accounts	No		Current year + 6 years	STANDARD DISPOSAL
Loans and grants managed by the school	No		Date of last payment on the loan + 12 years then REVIEW	SECURE DISPOSAL
Student Grant applications	Yes		Current year + 3 years	SECURE DISPOSAL
All records relating to the creation and management of budgets including the Annual Budget statement and background papers	No		Life of the budget + 3 years	SECURE DISPOSAL
Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year + 6 years	SECURE DISPOSAL
Records relating to the collection and banking of monies	No		Current financial year + 6 years	SECURE DISPOSAL
Records relating to the identification and collection of debt	No		Current financial year + 6 years	SECURE DISPOSAL
Contract Management				
All records relating to the management of contracts under seal	No	Limitation Act 1980	Last payment on the contract + 12 years	SECURE DISPOSAL
All records relating to the	No	Limitation Act 1980	Last payment on the	SECURE DISPOSAL

management of contracts under signature			contract + 6 years	
Records relating to the monitoring of contracts	No		Current year + 2 years	SECURE DISPOSAL
School Fund				
School Fund - Cheque books	No		Current year + 6 years	SECURE DISPOSAL
School Fund - Paying in books	No		Current year + 6 years	SECURE DISPOSAL
School Fund – Ledger	No		Current year + 6 years	SECURE DISPOSAL
School Fund – Invoices	No		Current year + 6 years	SECURE DISPOSAL
School Fund – Receipts	No		Current year + 6 years	SECURE DISPOSAL

School Fund - Bank statements	No		Current year + 6 years	SECURE DISPOSAL
School Fund – Journey Books	No		Current year + 6 years	SECURE DISPOSAL
School Meals Management				
Free School Meals Registers	Yes		Current year + 6 years	SECURE DISPOSAL
School Meals Registers	Yes		Current year + 3 years	SECURE DISPOSAL
School Meals Summary Sheets	No		Current year + 3 years	SECURE DISPOSAL

Property Management				
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Title deeds of properties belonging to the school	No		PERMANENT These should follow the property unless the property has been registered with the Land Registry	
Plans of property belong to the school	No		These should be retained whilst the building belongs to the school and should be passed onto any new owners if the building is leased or sold.	
Leases of property leased by or to the school	No		Expiry of lease + 6 years	SECURE DISPOSAL
Records relating to the letting of school premises	No		Current financial year + 6 years	SECURE DISPOSAL
All records relating to the maintenance of the school carried out by contractors	No		Current year + 6 years	SECURE DISPOSAL
All records relating to the maintenance of the school carried out by school employees including maintenance log books	No		Current year + 6 years	SECURE DISPOSAL

Central Government & Local Authority				
Basic file description	Data Protection Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
Local Authority				
Secondary Transfer Sheets (Primary)	Yes		Current year + 2 years	SECURE DISPOSAL
Attendance Returns	Yes		Current year + 1 year	SECURE DISPOSAL
School Census Returns	No		Current year + 5 years	SECURE DISPOSAL

Circulars and other information sent from the Local Authority	No		Operational use	SECURE DISPOSAL
Central Government				
OFSTED reports and papers	No		Life of the report then REVIEW	SECURE DISPOSAL
Returns made to central government	No		Current year + 6 years	SECURE DISPOSAL
Circulars and other information sent from central government	No		Operational use	SECURE DISPOSAL