



# Safeguarding Policy 2026



**Approved by:** Full Governing Body

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## SAFEGUARDING STATEMENT

Gastrells Community Primary School fully recognises our moral and statutory responsibility to safeguard and promote the welfare of all our pupils. We are committed to providing a safe and welcoming learning environment where children are respected and valued. We also have an inclusive, preventative educational approach to keeping children safe, including online. We are alert to the signs of abuse and neglect and exploitation and have procedures in place to ensure that children receive effective support, protection and justice. Child Protection forms part of the school's safeguarding responsibilities

### KEY CONTACTS

Role:	Name/ Details:	Contact:
Designated Safeguarding Lead	Helen Seward Headteacher	01453 765959
Deputy Designated Safeguarding Lead	Alex Brown Deputy Headteacher	01453 765959
Deputy Designated Safeguarding Lead	Helen Evans Fiona Radway Becky Hyatt	01453 765959
Nominated Governor for Safeguarding and Child Protection Chair of Governors	Tanya Phelps	07590410158
	Patricia Carrington	07977907478
Nominated Deputy Governor for Safeguarding and Child Protection		
Gloucestershire County Council Local Authority Designated Officer	LADO	01452 426320 amadmin@gloucestershire.gov.uk
Gloucestershire County Council Director of Childrens Services	Ann James	01452 583503 <a href="mailto:ann.james@gloucestershire.gov.uk">ann.james@gloucestershire.gov.uk</a>
Gloucestershire Multi-Agency Safeguarding Hub (MASH)	0900 – 1700 hours.	01452 426565
Police	In an emergency	999
	For non-emergency but possible crime	101

Gloucestershire Safeguarding Children's Executive (GSCP)	<a href="https://www.gloucestershire.gov.uk/gscp/">https://www.gloucestershire.gov.uk/gscp/</a>	01452 583629
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## INTRODUCTION

Safeguarding is everyone's responsibility. Everyone who meets children and their family groups has a role to play ensuring children are safe from abuse, exploitation and harm. The overall consideration always must be what is in the best interests of the child. This policy therefore applies to all permanent, temporary and support staff members, governors, volunteers, parents/carers, families and pupils who form part of the Gastrells Community.

Safeguarding is a term which is broader than Child Protection; it is defined as:

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

This policy document provides the basis for good practice within the school for safeguarding work and outlines the processes to be followed if any abuse or neglect and exploitation is alleged or suspected.

## Policy Aims

The Aims of this Policy are to:

- To raise awareness of individual responsibilities in identifying and reporting possible cases of abuse. All staff to be made aware that they may raise concerns directly to children's social care services.
- To provide a systematic means of monitoring, recording and reporting concerns.
- To provide guidance on recognising and reporting suspected child abuse.

## THE LEGAL FRAMEWORK

Section 175 of the Education Act 2002 places a duty on governing bodies of maintained schools to make arrangements for ensuring that their functions relating to the conduct of the school are exercised with a view to safeguarding and promoting the welfare of children who are pupils at the school.

Under Section 10 of the Children Act 2004, all maintained schools are required to co-operate with the local authority (Gloucestershire County Council) to improve the wellbeing of children in the local authority area. Additionally, under Section 14B of this Act, the Gloucestershire Safeguarding Children's Executive (GSCP) can require a school to supply information in order to perform its functions; this must be complied with.

Where a school places pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs (Para 171 of KCSIE 2025).

This policy has been developed in accordance with the principles established by:

- the Children Acts 1989 and 2004;
- the Education Act 2002,
- “Working Together to Safeguard Children” 2023
- Keeping Children Safe in Education 2025
  
- The EYFS Guidance 2023  
[https://assets.publishing.service.gov.uk/media/65aa5e42ed27ca001327b2c7/EYFS\\_statutory\\_framework\\_for\\_group\\_and\\_school\\_based\\_providers.pdf](https://assets.publishing.service.gov.uk/media/65aa5e42ed27ca001327b2c7/EYFS_statutory_framework_for_group_and_school_based_providers.pdf)
  
- Revised Safeguarding Statutory Guidance 2 “Framework for the Assessment of Children in Need and their Families” 2000
- “What to do if You are Worried a Child is Being Abused” 2003,
- Prevent Duty Guidance 2023  
[https://assets.publishing.service.gov.uk/media/65e5a5bd3f69457ff1035fe2/14.258\\_HO\\_Prevent\\_Duty\\_Guidance\\_v5d\\_Final\\_Web\\_1\\_.pdf](https://assets.publishing.service.gov.uk/media/65e5a5bd3f69457ff1035fe2/14.258_HO_Prevent_Duty_Guidance_v5d_Final_Web_1_.pdf);
  
- Disqualification under the Childcare Act 2006 (updated 2018)  
<https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006/disqualification-under-the-childcare-act-2006>;
  
- Multi-agency statutory guidance on female genital mutilation 2020  
[https://assets.publishing.service.gov.uk/media/613f26d5e90e07044435c949/6.7166\\_HO\\_FBIS\\_BN\\_O\\_Leaflet\\_A4\\_FINAL\\_080321\\_WEB.pdf](https://assets.publishing.service.gov.uk/media/613f26d5e90e07044435c949/6.7166_HO_FBIS_BN_O_Leaflet_A4_FINAL_080321_WEB.pdf); Channel Duty Guidance: Protecting people susceptible to radicalisation (2023)  
[https://assets.publishing.service.gov.uk/media/651e71d9e4e658001459d997/14.320\\_HO\\_Channel\\_Duty\\_Guidance\\_v3\\_Final\\_Web.pdf](https://assets.publishing.service.gov.uk/media/651e71d9e4e658001459d997/14.320_HO_Channel_Duty_Guidance_v3_Final_Web.pdf);
- [Multi-agency statutory guidance for dealing with forced marriage and multi-agency practice guidelines: handling cases of forced marriage \(2023\)](https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage/multi-agency-statutory-guidance-for-dealing-with-forced-marriage-and-multi-agency-practice-guidelines-handling-cases-of-forced-marriage-accessible)  
<https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage/multi-agency-statutory-guidance-for-dealing-with-forced-marriage-and-multi-agency-practice-guidelines-handling-cases-of-forced-marriage-accessible>
  
- and “Keeping Children Safe in Education” (KCSIE 2025).  
[https://assets.publishing.service.gov.uk/media/64f0a68ea78c5f000dc6f3b2/Keeping\\_children\\_safe\\_in\\_education\\_2025](https://assets.publishing.service.gov.uk/media/64f0a68ea78c5f000dc6f3b2/Keeping_children_safe_in_education_2025). [Keeping children safe in education 2025](https://learning.nspcc.org.uk/safeguarding-child-protection-schools/safeguarding-children-with-special-educational-needs-and-disabilities-send)  
<https://learning.nspcc.org.uk/safeguarding-child-protection-schools/safeguarding-children-with-special-educational-needs-and-disabilities-send>

<https://learning.nspcc.org.uk/safeguarding-child-protection/deaf-and-disabled-children>

## ROLES AND RESPONSIBILITIES

The school's **Designated Safeguarding Lead (DSL)** is the Head Teacher (Helen Seward). The **Deputy DSLs** are Alex Brown (Deputy Headteacher), Helen Evans, Fiona Radway, Becky Hyatt.

The DSL has ultimate lead responsibility for all safeguarding and child protection (including online safety) matters relating to the school.

The detailed role of the DSL is set out in KCSIE 2025, Annex C. In sum, however, the DSL is required to:

- **Manage Referrals**
  - Refer cases of suspected abuse to the local authority's children social care team,
  - Refer cases to the Channel programme where children are suspected of being vulnerable to being drawn into terrorism,
  - Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service, and
  - Refer cases where a crime may have been committed to the Police.
  - To be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for all those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent programme, etc.
- **Work with Others**
  - Act as a point of contact with the three safeguarding partners (local authority, local clinical commissioning group and the Police),
  - Liaise closely with the local authority for child protection concerns in cases which concern a staff member,
  - Ensure all staff take responsibility
  - Liaise with staff on matters of safety and safeguarding (including online and digital safety) and when deciding to make a referral by liaising with relevant agencies, and
  - Act as a source of support, advice and expertise for all staff, including to any staff member who is the subject of an allegation.
- **Raise Awareness**
  - Establish a whole-school safeguarding culture where sexual misconduct is seen as unacceptable.
  - Ensure the school's policies and processes are known, understood and used appropriately,
  - Ensure that this policy is reviewed at least annually through the Governing Body,
  - Ensure the Safeguarding and Child Protection Policy are available on the school website,
  - Ensure that all staff are kept up to date with safeguarding guidance, and
  - Maintaining a Vulnerability Matrix that identifies environment factors that are a threat to their safety and/or welfare (contextual safeguarding) as specified in KCSIE 2025.

The DSL and Deputy DSL are required to undergo training to provide them with the knowledge and skills required to carry out the role; this training should be updated every 2 years. Additionally, the DSL should undertake Prevent awareness training.

The school has a nominated **Governor Lead for Safeguarding** (Tanya Phelps) to champion good practice, liaise with the Head Teacher and to provide information and reports to the Governing Body. The Deputy Lead is .

The **Governing Body** is collectively responsible for ensuring that safeguarding arrangements are fully embedded within the school's ethos and reflected in day-to-day practice.

All **staff members, governors, volunteers and external providers** need to be aware of how to recognise the signs and symptoms of abuse, how to respond to pupils who disclose abuse and what to do if they are concerned about a child. All staff should be aware of the behaviours and physical signs which may put children in danger. Safeguarding issues can also manifest themselves via child-on-child abuse which may include bullying (including cyber bullying), gender-based violence/sexual assaults and sexting. All staff at Gastrells Community Primary School recognise that children can abuse their peers. All staff must challenge any form of derogatory and sexualised language or behaviour and be vigilant to sexualised/aggressive touching/grabbing.

Additionally, the school recognises that there are groups of children who are at particular risk of abuse and harassment; this includes girls, students who identify as, or are perceived by peers as, Lesbian, Gay, Bisexual, non – binary, Transgender+ (LGBT+) or questioning their gender and children with Special Educational Needs and Disabilities (SEND). Staff are aware they can signpost to specialist organisations such as (but not limited to):

- The Special Educational Needs and Disabilities Information and Support Services (SENDIASS) – SENDIASS offers information, advice and support for parents and carers of children and young people with SEND.
- Mencap – Represents people with learning disabilities, with specific advice and information for people who work with children and young people.

We also recognise that children with Adverse Childhood Experiences (ACEs), such as exposure to trauma, abuse or violence, may find it difficult to develop a sense of self-worth; they may feel helpless, humiliated and some sense of blame. Our school may be the only stable, secure and predictable element in their lives; we are alive to that responsibility and undertake to provide support in accordance with our mental health and wellbeing commitment. The school will provide a safe space for all children to speak out or share any concerns they may have, with members of staff.

Everyone employed at Gastrells is expected to work with and support different agencies to enable the most appropriate intervention to take place. All staff must ensure that the needs and safety of the children are at the forefront of their practice. In their day-to-day contact with individual children during school terms, teachers and other school staff are particularly well placed to observe outward signs of abuse, changes in behaviour or failure to develop.

## **STAFF TRAINING**

All staff must read and understand "Keeping Children Safe in Education 2025 together with the school safeguarding, whistleblowing and online safety policies. All staff will also receive safeguarding training on a continuous basis. All new staff/volunteers/governors to read (and sign as having understood) the policy within 7 days of appointment. This includes formal external training from the GSCP every three years, annual in-house training, workshop meetings, continual training in the form of email updates, e-bulletins and an item on the agenda of all staff meetings. All new staff receive safeguarding and online safety induction including the safer working practice document. This document is used as the code of staff conduct.

## SAFER WORKFORCE/RECRUITMENT

In line with KCSIE 2025, shortlisting includes reasonable online searches for shortlisted candidates. Pre-appointment checks include enhanced DBS (with children's barred list where appropriate), identity, right to work, professional qualifications, and (where applicable) Section 128 and prohibition checks. Where the school places a pupil with an alternative provision provider, we retain responsibility for the safeguarding of that pupil and obtain assurance that the provider meets our standards.

The school will do its utmost to prevent people who pose risks to children from working or volunteering in any capacity at the school by ensuring that robust safeguarding checks are carried out in accordance with KCSIE 2025. This includes an authoritative identity verification process and ensuring that there is a check on any prohibition, direction, sanction or restriction on all individuals with QTS (not just teaching staff) and also those involved in 'teaching work' before they have access to children. The school will, where feasible, do an online and social media search as part of pre-recruitment checks of shortlisted candidates and will make them aware of this. In addition to obtaining Disclosure and Barring Service (DBS) certificates, anyone who is appointed to teaching work will require an additional Section 128 check to ensure they are not prohibited from teaching and verification of the award of qualified teacher status from the Teacher Service system. The school maintains a single Central Record of all safer recruitment checks; the Headteacher has oversight of this record. The recruiting procedure and interview process will include at least one member of staff or governor with safer recruitment training.

Relevant weblinks below:

<https://www.gov.uk/guidance/check-the-childrens-barred-list>

<https://www.gov.uk/guidance/check-a-teachers-record>

<https://www.gov.uk/government/collections/individuals-prohibited-from-managing-or-governing-schools>

## SUPERVISION OF CHILDREN OFF-SITE

Safeguarding and Child Protection procedures are applied for all off-site activities. Local Authority guidance regarding pupil/adult ratio is adhered to and, where appropriate, professional staff are expected to challenge individuals in the interests of child protection without placing themselves at risk.

**It is inadvisable for members of staff to give pupils a lift.** In the extreme case when children need to be transported by staff the following must apply:

- a risk assessment must be undertaken. This should be done alongside a member of the senior management team and the Designated Safeguarding Lead or Deputy, to consider whether:
  - The journey is necessary and appropriate
  - The pupil has behaviour, safeguarding, health or mobility issues
  - Have appropriate insurance and MOT
  - The pupil may require medication during the journey
  - The number of adults required for a safe journey (usually, minimum 2)
  - Whether the adults are fit to carry out the journey e.g. have any health issues that may put them or the pupil at risk

- Safeguards can be put in place to reduce any risks identified. No adults involved in transporting should do this unless they have had appropriate Safeguarding and behaviour management training & Recruitment checks for 'regulated activity'

## **SAFEGUARDING CURRICULUM**

It is important that students are taught how to keep themselves safe, including online safety. At Gastrells students have a designated online safety activity and/or lesson on a weekly basis. The Gloucestershire Healthy Living and Learning Pink Curriculum is used as a basis for the PSHEC (**Personal, Social, Health, Economic, Citizenship Education**) and Safeguarding Curriculum. Safeguarding is an integral part of all the teaching and learning within the school.

## **RADICALISATION AND EXTREMISM**

The school has due regard to the Prevent duty under section 26 of the Counterterrorism and Security Act 2015, as set out in the Home Office Prevent Duty Guidance (2023, in force from 31 December 2023) and Channel Duty Guidance (2023). Risk assessment, staff training and IT policies reflect this.

The school is subject to a duty under section 26 of the Counterterrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. The Prevent duty is part of the school's wider safeguarding obligations and is outlined at Annex D.

## **WORKING WITH PARENTS AND CARERS**

The school has an established approach to working with parents and recognises that the privacy needs of parents, carers and children must be respected. Attitudes to and contact with parents should be non-judgemental to obtain the most conducive working relationship. The priority is the needs of the child and effective liaison is crucial for this. Gastrells also recognises that families from different backgrounds and cultures may have different approaches to child-rearing. These differences will be acknowledged and respected if they do not place the child at risk of harm.

Parental awareness of safeguarding and online safety issues is supported through email bulletins, updates on the newsletters, parents' evenings and workshops (when appropriate).

## **SUPPORTING CHILDREN**

Gastrells Community Primary School will support all children by:

- Ensuring the content of the curriculum includes social and emotional aspects of learning; pupils will be encouraged to talk about feelings and deal assertively with pressures, are listened to, and know to whom they can turn to for help and advice.
- Providing pupils with a range of adults to approach if they are in difficulties; supporting the child's development in ways that will foster security, confidence and independence and encourage the development of self-esteem and self-assertiveness whilst not condoning aggression or bullying.
- Ensuring a comprehensive curriculum response to online safety, enabling children and parents to learn about the safeguarding risks of new technologies and social media and to use these responsibly.
- Ensuring that the curriculum will help children stay safe, recognise when they do not feel safe and identify who they can turn to for support and who will help them become more resilient to inappropriate behaviours towards them, risk taking behaviours and attempted coercion into sexualised behaviour.
- Ensuring repeated hate incidents (e.g. racist, homophobic or gender- or disability-based bullying) are considered under safeguarding procedures.
- Ensuring that when a pupil who is the subject of a Child Protection Plan leaves Gastrells,

their information is transferred to their new school within 5 days and that the child's social worker is informed that the child has moved.

- Alerting the local authority if we become aware that any child is being looked after under a private fostering arrangement; and
- Acknowledging that Children in Care, or who have been previously looked after by the local authority, potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep these children safe.

## EARLY HELP

Our Early Help approach follows Working Together to Safeguard Children (December 2023): we identify emerging needs early, provide proportionate, joined-up support with a whole-family focus, and agree a lead practitioner where coordinated help is required. Thresholds and local arrangements are followed through Gloucestershire's multi-agency safeguarding arrangements.

Early Help and Support Intervention is an integral part of the school. All staff are aware of the Early Help available to the Parents, Carers and Children. The DSL and Deputy DSL will usually lead on Early Help within in the school. Points of Contact across the range of Early Help interventions are attached at Annex C.

See also

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

## SAFEGUARDING CONCEPTS

Abuse and Neglect and exploitation are the principal forms of maltreatment of a child; Abuse and Neglect and exploitation can be caused by inflicting harm, or by failing to prevent harm.

At Gastrells Community Primary School we treat abuse as abuse and instances will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". We ensure that our staff are aware of this ethos.

Children may potentially be the subject of abuse in any setting: within their family group, in an institutional, educational or community setting, by those known to them or by a stranger, by an adult or adults, by another child or young person or by a group of children. It is incumbent on any individual who has concerns that a child is being abused or neglected or exploited to take action to prevent further harm.

### Forms of Abuse and Neglect and exploitation

Detailed definitions of the potential forms of abuse, and the signs and symptoms, are outlined at Annex A. In sum, however:

- **Physical Abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- **Emotional Abuse** involves 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, unloved, inadequate or valued only so far as they meet the needs of others. This form of abuse may also involve interactions which are beyond the child's developmental capability, as well as over-protection, limitations of exploration and learning or preventing normal social interaction. It may also involve bullying (including cyber bullying) causing children to feel frightened or at risk of exploitation.
- **Sexual Abuse** involves forcing or enticing a child 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. Sexual abuse may involve inappropriate physical contact, including assault by penetration or non-penetrative acts. It may also include non-contact activities such as involving children in looking at, or in the production of, sexual images or activities or grooming a child in preparation for abuse.

- **Neglect** is the persistent failure to meet a child's basic physical and psychological needs which is likely to result in the serious impairment of the child's health or development. Neglect may include a failure to provide adequate food, clothing and shelter, including exclusion from home or abandonment, failing to protect a child from physical or emotional harm or danger, failure to ensure appropriate medical care or unresponsiveness to a child's basic emotional needs.

## Online Safeguarding

Filtering and monitoring standards: The school aligns with the DfE "Filtering and Monitoring Standards for Schools and Colleges" (2023, updated 2024/25). Roles and responsibilities are allocated between governors (strategic assurance), the Senior Leadership Team (procurement, policy and oversight), the DSL (lead for safeguarding and online safety, overseeing and acting on filtering/monitoring reports), and IT support (technical implementation and reporting). Provision is reviewed at least annually; systems block illegal, inappropriate and harmful content without unreasonably impacting teaching and learning; and effective monitoring strategies are in place on all school-owned devices and connections. Staff receive training on their responsibilities. (See KCSIE 2025 and the DfE standards).

At Gastrells we recognise that the use of technology has become a significant component of many safeguarding issues (e.g. Child sexual exploitation, Sexting, Radicalisation and Sexual predation). Technology often provides the platform that facilitates harm. An effective approach to online safety empowers us to protect and educate the whole school in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

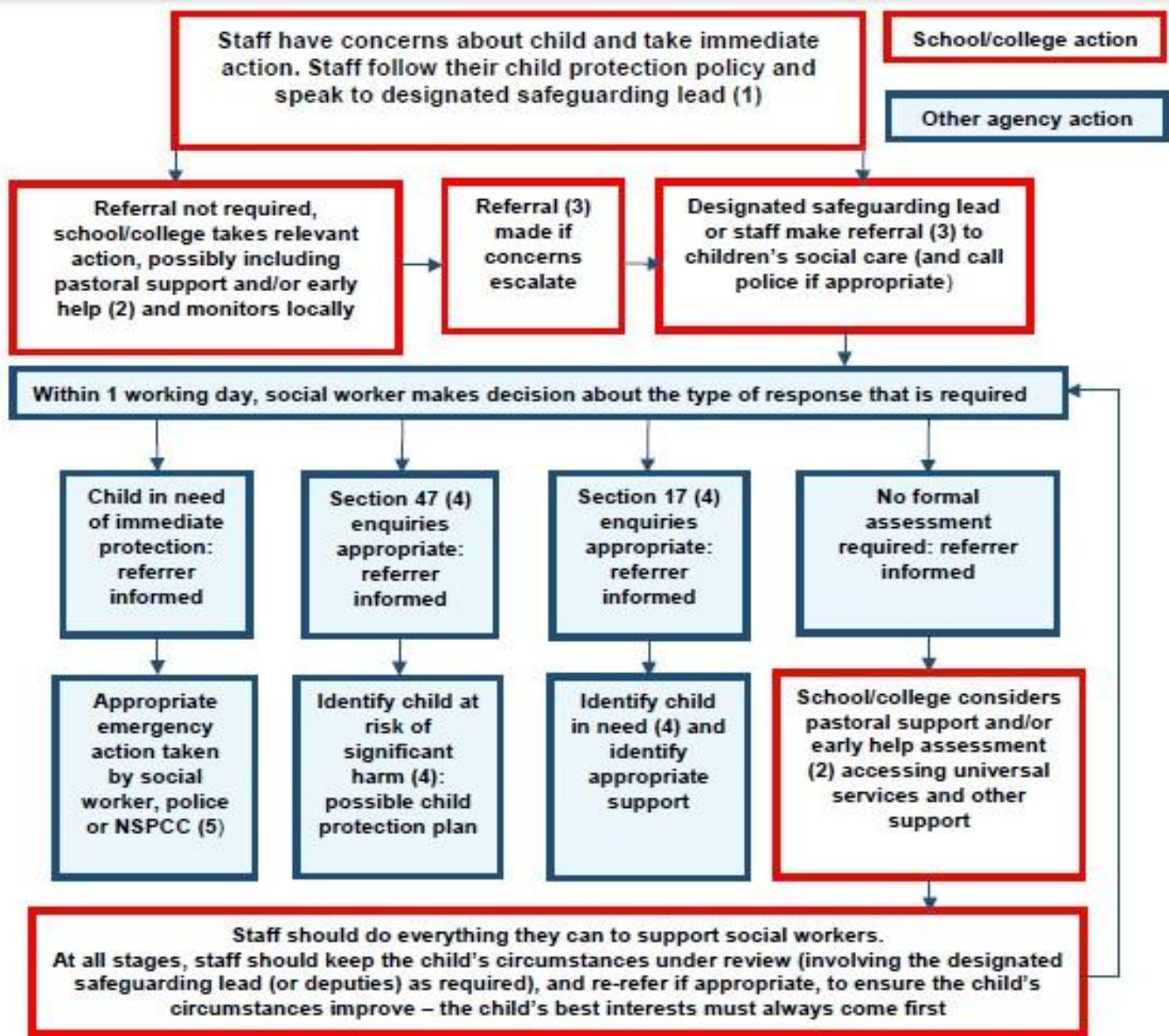
- **Content:** Being exposed to illegal, inappropriate or harmful material.
- **Contact:** Being subjected to harmful online interaction with other users; and
- **Conduct:** Personal online behaviour that increases the likelihood of, or causes, harm.
- **Commerce:** Being the subject of phishing, gaming or other financial risks.

The School's approach to online safety is further outlined in our [acceptable-use-policy-2019.pdf \(wordpress.com\)](#). The school has active filtering and monitoring systems in place throughout the school software including school devices; these systems are tested regularly, using a "test the internet connection" tool.

All staff will receive training on the expectations, applicable roles and responsibilities in relation to filtering and monitoring. The DSL will take lead responsibility for understanding the filtering and monitoring systems and processes in place and the school will take account of the Department for Education's new filtering and monitoring standards (DfE, 2023b), which support schools to have effective systems in place. The school will also consider meeting the DfE's Cyber security standards for schools and colleges (DfE, 2023c). Where an incident occurs which a member of staff considers may have Safeguarding or Child Protection implications, it will be dealt with through the School Safeguarding Procedure.

### SAFEGUARDING PROCEDURES

Gastrells Community Primary School has an established procedure, in line with KCSIE 2025 and Gloucestershire Safeguarding Children's Executive guidance, which will be followed by all members of the school community in cases of suspected abuse and neglect and exploitation. This procedure fits in to the wider Safeguarding and Child Protection protocol which is outlined below:



- (1) cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.
- (2) Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chances of a problem getting worse.
- (3) Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.
- (4) [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.
- (5) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#)
- (6) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#). This could include applying for an Emergency Protection Order (EPO)

## Actions to be taken in the Event of Child Protection or Safeguarding Concern

Any member of the school community who has concerns that a child is being abused or neglected or exploited, or may be at risk of such harm, has an individual responsibility to ensure that their concern is reported and taken forward.

Concerns may come to light through either direct disclosure by the child or by observations (such as ongoing and unexplained bruising or changed behavioural pattern) which indicate that abuse or neglect and exploitation may be occurring.

The detailed procedure, and notes for guidance, are attached at Annex B. In sum, however, it is incumbent on the member of staff having a concern to **Record**:

- The Date and Time of the Disclosure or Incident
- The Place and Context of Disclosure or Concern
- The Facts which cause Concern

And then to **Report** the issue as soon as possible to the Designated Safeguarding Lead (DSL) or, in her absence, the Deputy DSL. If for any reason the DSL and Deputy DSL are unavailable, and there is a perceived immediate risk to the child, then advice should be sought from the Gloucestershire Multi-Agency Safeguarding Hub (MASH).

The **DSL** will then make a decision whether to continue to monitor the situation internally, initiate an Early Help assessment or to refer the matter further to Children's Social Care, the Local Authority Designated Officer (LADO), the MASH, if appropriate, to the Police.

See also:

<https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/2020/when-to-call-the-police--guidance-for-schools-and-colleges.pdf>

The DSL will, in all cases, communicate their decision to the individual making the initial referral. If that individual still believes the child to be at risk then, like any private citizen, they have the right, and indeed **personal responsibility**, to seek advice from the MASH. In such cases, they are asked to also advise either the Chair of Governors or the nominated Governor Lead for Safeguarding as soon as practical.

## **RECORD-KEEPING**

Any member of staff, visitor or volunteer who has a concern over a pupil's welfare, or who receives a disclosure of abuse, will make an accurate record, as soon as possible, noting what was said and seen, putting the event into context and giving the time, date and location. Records of concern or disclosure will be kept (even if there is no need to make a referral immediately). These records are stored confidentially in the child's Safeguarding File held by the Headteacher; these files will be organised clearly with a chronology at the front which will be reviewed by the DSL at regular intervals. When a child moves to another school, safeguarding/child protection documentation will be passed as soon as possible to the receiving school, separate from academic records. Confidentiality will be maintained throughout and information relating to individual pupils or families shared with staff on a need to know basis.

## **ALLEGATIONS AGAINST STAFF AND VOLUNTEERS**

Procedures for managing concerns or allegations (including those that may meet the harm threshold and those that are low-level) follow Part 4 of KCSIE 2025. Low-level concerns are recorded centrally and patterns are monitored.

It is recognised that addressing allegations against members of staff or volunteers, who may be friends as well as professional colleagues, are a sensitive area to address. However, the needs of the child/children must remain paramount. At Gastrells, all allegations will be dealt with according to the guidance set out by the Gloucestershire Children Safeguarding Executive.

Any allegation concerning a teacher or other member of the school community (including a volunteer) must be reported to the Headteacher (as the DSL). The Headteacher is then responsible for ensuring both that all children at the school, and particularly an alleged victim, are or is protected and also for informing the LADO within one working day. If a serious criminal offence is alleged to have been committed the police must be informed. The LADO will advise on how to proceed, whether the matter can be dealt with within the school's structures or whether a multi-agency meeting is required.

Should any member of staff suspect the DSL of abuse they should report their concerns to the LADO direct and seek advice from the Chair of the Governing Body or the Nominated Governor Lead for Safeguarding as soon as practical.

### **There are two levels of allegation/concern:**

1. Allegations that may meet the harms threshold.
2. Allegation/concerns that do not meet the harms threshold – known as 'low level concerns'.

### **1. Allegations that may meet the harms threshold**

These procedures are for managing cases of allegations that might indicate a person (including all staff, supply teachers, volunteers and contractors) would pose a risk of harm if they continue to work in their present position, or in any capacity with children in the school.

Examples of situations that may meet the harms threshold include:

- Behaving in a way that has harmed a child, or may have harmed a child

- Possibly committed a criminal offence against or related to a child
- Behaving towards a child or children in a way that indicates he or she may pose a risk of harm to children
- Behaving in a way that indicates they may not be suitable to work with children

This includes behaviour that may have happened outside of school.

## **2. Concerns that may not meet the harms threshold**

### **Low-level concerns policy (see also Annex F)**

At Gastrells we believe in creating a culture of openness, trust and transparency in which the clear values and expected behaviour which are set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff.

All staff should feel enabled to share any concerns – no matter how small – about their own or another member of staff's behaviour with the Headteacher.

The term 'low-level' concern does not mean that it is insignificant. It means that the behaviour towards a child does not meet the threshold set out above.

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school 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 LADO.

Examples of low level concerns could include but are not limited to:

- An adult talking to children about getting drunk;
- An adult leaning over a pupil in order to help that and the pupil stating they feel uncomfortable/intimidated;
- Showing favouritism;

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate (but might not be in specific circumstances), through to that which is ultimately intended to enable abuse.

### **Reporting and recording low-level concerns**

We expect all staff to report any low-level concerns directly to the Headteacher within 24 hours of becoming aware of it – although it is never too late to share a low-level concern. Having one recipient of all such concerns should allow any potential patterns of concerning, problematic or inappropriate behaviour to be identified, and ensure that no information is possibly lost.

Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is not serious enough to consider a referral to the LADO, or whether it meets the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination will be made by the Headteacher.

If the Headteacher is absent for any reason, low-level concerns should be shared with another Safeguarding Lead, who will inform the Headteacher immediately on their return.

If any low-level concern relates to the behaviour of the Headteacher it should be reported to the Chair of Governors.

Staff have the option of sharing their low-level concern verbally with the Headteacher, or of providing them with a written summary of it.

Where the low-level concern is provided verbally, the Headteacher should make an appropriate record of the conversation, either contemporaneously or immediately following the discussion. Sound professional judgement should be exercised by them in determining what information is necessary to record for safeguarding purposes. The name of the individual sharing the low-level concern, and their role, should be stated, as should the name of the individual about whom the concern is being raised, and their role within the organisation at the time the concern is raised.

The record should include brief context in which the low-level concern arose, and concise details (which are chronological and as precise and accurate as possible) of any such concern and relevant incident(s). The record should be signed, timed and dated.

The full procedures about dealing with allegations of abuse made against/concerns raised in relation to teachers and other staff can be found in Part Four of the DfE guidance "Keeping children safe in education". <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

## **PHYSICAL CONTACT WITH PUPILS**

Some form of physical contact with pupils by staff is inevitable. In some cases it is necessary for reassurance. However, all staff should be aware of issues related to touching and the way in which this might be misconstrued. This relates particularly to any sensitive areas of the body.

Physical guidance and positive handling is kept to the minimum and is used in order to prevent the pupil from causing injury to themselves, others or property. Following such an intervention an incident form should be completed (as outlined in the school's Behaviour Policy) Staff should also be mindful of Government guidelines in response to health emergencies when considering whether physical contact is appropriate.

Where it is likely or necessary for staff to directly assist children who have wet or soiled themselves, then a Permission Form for Intimate Care is to be completed by the parent/carer; a record of intimate care interventions is to be kept in respect of each child.

## **WHISTLEBLOWING AND COMPLAINTS**

We recognise that children cannot be expected to raise concerns in an environment where staff members fail to do so. Whilst at Gastrells we aim to operate in a transparent and open manner, all staff are aware of the School Whistleblowing Policy and, should the individual consider that they cannot discuss an issue with the Headteacher, are also aware of the avenues open to them.

We will ensure that all staff are aware of their duty to raise concerns, where they exist, about the management of Safeguarding, which may include the attitude or actions of colleagues. If necessary, they can speak direct to the Headteacher, the Chair of Governors or with the LADO. Where a member of staff feels unable to raise a concern with either of the individuals identified above, the NSPCC whistle-blowing helpline is available to them.

## **SITE SECURITY**

We are aware of the security limitations of the Gastrells site. However, we check the identity of all visitors and volunteers coming into the school and visitors are expected to sign in and out of the Visitors Log located in the School Office, this is compliant with the DfE [https://www.gov.uk/government/publications/guidance-for-full-opening-special-schools-and-other-specialistsettings?utm\\_source=9%20September%202020%20C19&utm\\_medium=Daily%20Email%20C19&utm\\_campaign=DfE%20C19](https://www.gov.uk/government/publications/guidance-for-full-opening-special-schools-and-other-specialistsettings?utm_source=9%20September%202020%20C19&utm_medium=Daily%20Email%20C19&utm_campaign=DfE%20C19) and will be escorted throughout their time on the site as necessary. No unescorted visitor will have access to children unless they are known to the school and have an appropriate level of DBS clearance. Staff are aware of their responsibility to challenge any non-member of staff who is not known or identifiable for clarification and reassurance.

The school will not accept the behaviour of any individual, parent or anyone else that threatens school security or leads to others (child or adult) to feel unsafe. Such behaviour will be treated as a serious safeguarding concern and may result in a decision to refuse the person access to the school site.

## **ORGANISATIONS OR INDIVIDUALS USING SCHOOL PREMISES**

When services or activities are provided by the governing body or under the direct supervision or management of school staff, the school's arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. The governing body will therefore seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place for the provider to liaise with the school on these matters where appropriate.

This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll. The governing body will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement. The guidance on Keeping children safe in out-of-school settings details the safeguarding arrangements that schools and colleges should expect these providers to have in place and also includes information on responding to allegations relating to incidents occurring when an individual or organisation uses a school's premises. As with all safeguarding allegations, schools should follow their safeguarding policies and procedures, including informing the Local Authority Designated Officer (LADO).

## **REVIEW AND MONITORING OF THE POLICY**

We will ensure that systems are in place to monitor the implementation of, and compliance with, this policy and accompanying procedures. We will complete an annual audit of the school's safeguarding arrangements and the Senior Management Team and the Board of Governors will

ensure that action is taken to remedy any deficiencies identified in child protection arrangements without delay.

This policy and the procedures will be reviewed every academic year, or earlier if legislation changes. The DSL will ensure that staff members, including volunteers, are made aware of any amendments to this policy.

Annexes:

- A. Definitions and Indicators of Abuse and Neglect and exploitation.
- B. Action to be taken in the event of a Child Protection or Safeguarding Incident.
- C. Early Help Points of Contact.
- D. The Prevent (Radicalisation and Extremism) Duty.
- E. Gloucestershire Encompass School Pathway
- F. FAQs ON LOW-LEVEL CONCERNS

## **ANNEX A**

### **DEFINITIONS AND INDICATORS OF ABUSE OR NEGLECT AND EXPLOITATION**

This Annex outlines the definitions and Indicators of Abuse and Neglect and exploitation and also includes additional information on factors or situations which pose safeguarding risks.

#### **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.

#### **The physical signs of abuse may include:**

- Unexplained bruising, marks or injuries on any part of the body
- Multiple bruises in clusters, often on the upper arm, outside of the thigh
- Cigarette burns
- Human bite marks
- Broken bones
- Scalds, with upward splash marks.
- Multiple burns with a clearly demarcated edge.

#### **Changes in behaviour that can also indicate physical abuse:**

- Fear of parents being approached for an explanation
- Aggressive behaviour or severe temper outbursts
- Flinching when approached or touched
- Reluctance to get changed, for example in hot weather
- Depression
- Withdrawn behaviour
- Running away from home

#### **EMOTIONAL ABUSE**

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to 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. It may involve serious bullying (including cyber-bullying), 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.

Emotional abuse can be difficult to measure, as there are often no outward physical signs. There may be a developmental delay due to a failure to thrive and grow, although this will usually only be evident if the child puts on weight in other circumstances, for example when hospitalised or away from their parents' care. Even so, children who appear well-cared for may nevertheless be emotionally abused by being taunted, put down or belittled. They may receive little or no love, affection or attention from their parents or carers. Emotional abuse can also take the form of children not being allowed to mix or play with other children.

#### **Changes in behaviour which can indicate emotional abuse include:**

- Neurotic behaviour e.g. sulking, hair twisting, rocking
- Being unable to play
- Fear of making mistakes
- Sudden speech disorders
- Self-harm
- Fear of parent being approached regarding their behaviour
- Developmental delay in terms of emotional progress

#### **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 abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males; women can also commit acts of sexual abuse, as can other children.

#### **The physical signs of sexual abuse may include:**

- Pain or itching in the genital area
- Bruising or bleeding near genital area
- Sexually transmitted disease
- Vaginal discharge or infection
- Stomach pains
- Discomfort when walking or sitting down

- Pregnancy

### **Changes in behaviour which can also indicate sexual abuse include:**

- Sudden unexplained changes in behaviour e.g. becoming aggressive or withdrawn
- Fear of being left with a specific person or group of people
- Having nightmares
- Running away from home (or school)
- Sexual knowledge which is beyond their age, or developmental level
- Sexual drawings or language
- Bedwetting
- Eating disorders such as overeating or anorexia nervosa
- Self-harm or mutilation, sometimes leading to suicide attempts
- Saying they have secrets they cannot tell anyone about
- Substance or drug abuse
- Suddenly having unexplained sources of money
- Not allowed to have friends (particularly in adolescence)
- Acting in a sexually explicit way towards adults

### **Sexual Abuse by Young People**

Whilst the legal age of consent to any form of sexual activity in England is 16, the boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children.

Developmental Sexual Activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Inappropriate Sexual Behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child or young person has been exposed. If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Abusive sexual activity, however, includes any behaviour involving coercion, threats, aggression, together with secrecy, or where one participant relies on an unequal power base.

## **NEGLECT AND EXPLOITATION**

Neglect and exploitation is the persistent failure to meet a child's basic physical and/or psychological needs which is likely to result in the serious impairment of the child's health or development. Neglect and exploitation may occur during pregnancy because of maternal substance abuse. Once a child is born, neglect and exploitation 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 that children subject to Adverse Childhood Experiences are provided with appropriate support;
- Ensure adequate supervision (including the use of inadequate caregivers); or
- Ensure access to appropriate medical care or treatment.

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

### **The physical signs of neglect and exploitation may include:**

- Constant hunger, sometimes stealing food from other children
- Constantly or frequently dirty or 'smelly'
- Loss of weight, or being constantly underweight
- Inappropriate clothing for the conditions.

### **Changes in behaviour which can also indicate neglect and exploitation may include:**

- Complaining of being tired all the time
- Not requesting medical assistance and/or failing to attend appointments
- Having few friends
- Mentioning being left alone or unsupervised

## **CHILD ON CHILD ABUSE**

Children can abuse other children; whilst it is more likely that girls will be victims and boys perpetrators, all child-on-child abuse is unacceptable and will not be tolerated. Child on child abuse can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

Whilst child on child bullying, fighting and harassment will not necessarily be seen as a child protection issue, it may be appropriate to regard a young person's behaviour as abusive if there is evidence of:

- Ongoing and Targeted Bullying (including cyberbullying);
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- Sexual violence and sexual harassment.
- Sexting (also known as youth produced sexual imagery); and
- Initiation/hazing type violence and rituals.

Any instances of bullying or abuse will be investigated promptly. In line with managing internally, the school may decide that the children involved do not require referral to statutory services but may benefit from early help. If it is considered that there could be a child protection consideration, then the DSL is to be advised, and the procedures outlined at Annex B will be followed. Victims, perpetrators or alleged perpetrators and any other child affected by child-on-child abuse will also be supported in line with this Annex.

The school seeks to minimise the risk of child-on-child abuse through awareness-raising amongst the pupil cadre through the PSHE curriculum and by an overt anti-tolerance approach.

## **BULLYING**

There is clear evidence that bullying is abusive and will include at least one of the defined categories of abuse.

Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. It can take many forms, but the three main types are **Physical** (e.g. hitting, kicking, theft, sexual), **Verbal** (e.g. racist or homophobic remarks, threats, name calling) and **Emotional** (e.g. isolating an individual from the activities and social acceptance of their peer group). The damage inflicted by bullying can frequently be underestimated. It can cause considerable distress to children to the extent that it affects their health and development or, at the extreme, cause them significant harm (including self-harm). All settings in which children are provided with services or are living away from home should have in place rigorously enforced anti-bullying strategies.

It is recognised that as a school with an embedded Communication & Interaction Centre and a historic prevalence of children with Special Educational Needs, some of our children have challenging behaviour as part of their disability. To take this into account each incident is assessed on an individual basis. If they are considered to be bullying they should be dealt with by the class teacher in the first instance and/or the Headteacher as appropriate. Any incidents that are considered to constitute peer to peer abuse should be dealt with by the Headteacher and/or the deputy Headteacher. A more detailed guide can be found in the school's anti-bullying policy.

## **SELF HARM**

Self-Harm is most frequently a coping behaviour associated with feelings of extreme emotional distress and carries a high associated risk of an underlying mental health disorder. Self-harm should never be overlooked and, if it comes to the attention of a teacher/member of staff that a child is self-harming, they should alert the designated person for child protection (the DSL). Their actions might include:

- Contacting parents/carers
- Contacting Child and Adolescent Mental Health Services (with parent/carer support)
- Contacting Social Care if the child meets the referral criteria

## **SEXTING**

Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others, or sends sexually explicit messages. These can be sent using mobiles, tablets, smartphones, laptops or any device that allows the sharing of media and messages. Sexting may also be referred to as:

- Trading nudes
- Dirties
- Pic for pic.

What the Law says.

Sexting can be seen as harmless but creating or sharing explicit images of a child is illegal, even if the person doing it is a child. A young person is **breaking the law** if they:

- Take an explicit photo or video of themselves or a friend,
- Share an explicit image or video of a child, even if it's shared between children of the same age
- Possess, download or store an explicit image or video of a child, even if the child gave their permission for it to be created.

However, as of January 2016 in England and Wales, if a young person is found creating or sharing images, the police can choose to record that a crime has been committed but that taking formal action is not in the public interest. Crimes recorded this way are unlikely to appear on future records or checks, unless the young person has been involved in other similar activities which may indicate that they are a risk.

It is essential that staff know what to do if an incident of sexting occurs. This must always be reported to the DSL who will follow the guidance set out in the "Sexting in schools and colleges: Responding to incidents and safeguarding young people" (UKCCIS, 2016).

## **CHILD SEXUAL EXPLOITATION**

The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist professionals in identifying children or young people who may be, or have been, victims of sexual exploitation.

- Underage sexual activity
- Inappropriate sexual or sexualised behaviour
- Sexually risky behaviour, 'swapping' sex
- Repeat sexually transmitted infections
- In girls, repeat pregnancy, abortions, miscarriage
- Receiving unexplained gifts or gifts from unknown sources
- Having multiple mobile phones and worrying about losing contact via mobile
- Having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- Changes in the way they dress
- Going to hotels or other unusual locations to meet friends
- Seen at known places of concern
- Moving around the country, appearing in new towns or cities, not knowing where they are
- Getting in/out of different cars driven by unknown adults
- Having older boyfriends or girlfriends
- Contact with known perpetrators
- Involved in abusive relationships, intimidated and fearful of certain people or situations
- Hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- Associating with other young people involved in sexual exploitation
- Recruiting other young people to exploitative situations
- Truancy, exclusion, disengagement with school, opting out of education altogether
- Unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- Mood swings, volatile behaviour, emotional distress

- Self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- Drug or alcohol misuse
- Getting involved in crime
- Police involvement, police records
- Involved in gangs, gang fights, gang membership
- Injuries from physical assault, physical restraint, sexual assault.

## **HONOUR BASED VIOLENCE**

So-called “honour-based” violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, practices such as breast ironing and acid violence. All forms of so-called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the DSL. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having experienced HBV.

## **FORCED MARRIAGE (FM)**

This is an entirely separate issue from Arranged Marriage. It is a human rights abuse and falls within the Crown Prosecution Service definition of domestic violence. Young men and women can be at risk in affected ethnic groups. Whistleblowing may come from younger siblings. Other indicators may be detected by changes in adolescent behaviours. Never attempt to intervene directly but any instances should be reported to the DSL who will take the necessary notification action.

## **FEMALE GENITAL MUTILATION (FGM)**

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM. Teachers should raise any FGM related concerns with the DSL (or Deputy DSL) but must also be aware of the legal responsibility on teachers personally to report any suspected act of FGM to the Police in line with the Female Genital Mutilation Act 2003 (Section 5B(11)(a)).

FGM involves procedures that intentionally alter/injure the female genital organs for non-medical reasons. There are four types of procedure:

- Type 1 – Clitoridectomy – partial/total removal of the clitoris
- Type 2 – Excision – partial/total removal of then clitoris and labia minora
- Type 3 – Infibulation entrance to vagina is narrowed by repositioning the inner/outer labia
- Type 4 – all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

FGM has traditionally been carried out in some communities in the belief that:

- FGM brings status/respect to the girl – social acceptance for marriage
- Preserves a girl’s virginity
- Part of becoming a woman / Rite of passage
- Upholds family honour
- Cleanses and purifies the girl
- Gives a sense of belonging to the community
- Fulfils a religious requirement
- Perpetuates a custom/tradition
- Helps girls be clean / hygienic

- Is cosmetically desirable
- Mistakenly believed to make childbirth easier

FGM is internationally recognised as a violation of human rights of girls and women. It is illegal in most countries including the UK.

## **CHILDREN AND THE COURT SYSTEM**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year-olds and 12–17-year-olds. These guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following parental separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

## **CHILDREN WITH UNEXPLAINABLE AND/OR PERSISTENT ABSENCES FROM EDUCATION**

Note (2024): Being absent, as well as missing, from education can be a vital warning sign of safeguarding concerns including abuse, neglect, sexual or criminal exploitation. The school follows DfE statutory guidance "Working together to improve school attendance" (from 19 August 2024) and our local procedures.

All staff are aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect and exploitation, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health disorders, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school or college's unauthorised absence and children missing from education procedures.

These principles also apply to children who may be *absent* from education, even for short periods. See <https://www.gov.uk/government/publications/working-together-to-improve-school-attendance>

## **CHILDREN WITH FAMILY MEMBERS IN PRISON**

Approximately 200,000 children in the UK have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders (NICCO) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

## **CHILD CRIMINAL EXPLOITATION: COUNTY LINES**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral

Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- Can affect any child or young person (male or female) under the age of 18 years.
  - Can affect any vulnerable adult over the age of 18 years;
  - Can still be exploitation even if the activity appears consensual.
  - Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
  - Can be perpetrated by individuals or groups, males or females, and young people or adults; and
  - Is typified by some form of power imbalance in favour of those perpetrating the exploitation.
- Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

## **HOMELESSNESS**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) will be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis. The school considers homelessness in the context of children who live with their families, and intervention will be on that basis.

## **DOMESTIC ABUSE**

The cross-government definition of domestic violence and abuse is: "Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality". Domestic abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional

Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or

may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Operation Encompass (Annex E) is a new innovative project in which schools in Gloucestershire will be participating, and which is run in partnership with Gloucestershire County Council, Gloucestershire Safeguarding Children Executive and Gloucestershire Police. Many other Local Authorities both nationally and locally have successfully implemented Operation Encompass.

Operation Encompass aims to support children and young people who are affected by domestic abuse. Witnessing or experiencing domestic abuse is really distressing for a child or young person, who often see the abuse, hear it from another room, see a parent's injuries or distress afterwards, or can be physically hurt by trying to stop the abuse.

Operation Encompass is an initiative enhances communication between the police and schools where a child is at risk from domestic abuse

The purpose of the information sharing is to ensure schools have more information to support safeguarding of children. By knowing that the child has had this experience, the school is in a better position to understand and be supportive of the child's needs and possible behaviours

Operation Encompass will complement existing safeguarding procedures

Operation Encompass offers free online key adult training.

<https://www.operationencompass.org/operation-encompass-on-line-key-adult-briefing>

## **ANNEX B**

### **ACTION TO BE TAKEN AT GASTRELLS COMMUNITY PRIMARY SCHOOL IN RESPONSE TO A CHILD PROTECTION EVENT OR SAFEGUARDING CONCERNS**

#### **PREAMBLE**

At Gastrells Primary School we have a responsibility to ensure that the children with whom we are in contact are protected from harm. The protection and welfare of the child is the paramount consideration in all actions. All professionals in contact with children and their families must be aware of the possibility of child abuse and neglect and exploitation and of the need to maintain vigilance at all times. Children must be listened to, taken seriously and their comments fully evaluated.

It is extremely difficult to determine if abuse has occurred. Teachers should look carefully at the behaviour of their children and be alert for significant changes.

#### **INDICATORS OF SAFEGUARDING OR CHILD PROTECTION CONCERNS**

Concerns may arise through either Disclosure to the Teacher by a child or through direct Observations of Injuries or a Changed Behaviour Pattern of the child (as outlined at Annex A).

Teachers should be particularly alert to the following potential symptoms of abuse or neglect and exploitation (whilst also being conscious that abuse or neglect and exploitation may not have occurred):

- Non-accidental injury, bruising or marks.

- Explanation inconsistent with injury.
- Several different explanations for an injury.
- Reluctance to give information about an injury
- Sudden change in behaviour – aggression, extroversion, depression, withdrawn.
- Attention-seeking
- Hyperactivity
- Poor attention
- Appear frightened of parents or family members
- Abnormal attachment between parent and child
- Indiscriminate attachment
- Hyper alertness.
- Reduced response.
- Frozen watchfulness.
- Nightmares.
- Anxiety/irritability.
- Abdominal pain/headaches.
- Poor self-esteem.
- Poor peer relationships
- Act in an inappropriate way for age
- Over sexualised play/talk or drawings.
- Excessive or inappropriate masturbation
- Self-harm/eating disorder
- Frequent visits to the toilet
- Reluctance to change for P.E.
- Failure to thrive
- Poor hygiene
- Recurrent/untreated infections of skin or head lice
- Untreated health/dental issues
- Frequent absence from school or repeated lateness
- Delay in meeting normal developmental milestones

Should a teacher consider, having taken advice if necessary, from the DSL, then he or she is to report the matter formally to the DSL without delay in accordance with the following protocols.

## **REPORTING PROCEDURE**

However concerns come to light, it is incumbent on the member of staff having a concern to **Record**:

- The Date and Time of the Disclosure or Incident
- The Place and Context of Disclosure or Concern
- The Facts which cause Concern

And then to **Report** the issue as soon as possible to the Designated Safeguarding Lead (DSL) or, in her absence, the Deputy DSL.

Whilst reports can initially be given verbally, they must be followed up with a written note. Written records of concerns about children, even where there is no need to refer the matter immediately, must be maintained and kept securely, separate from the main pupil file, and in locked locations. The DSL has the responsibility for investigating and determining the outcome of any concerns or allegations and is expected to maintain a dialogue with the member of staff making the report and to advise them of the way ahead.

## EMERGENCY REPORTING PROCEDURE

If the DSL or Deputy DSL are not available, the member of staff should establish the facts and details as above and contact the Gloucestershire Multi Agency Safeguarding Hub (MASH) Children's Helpdesk (01452 426565), discuss the case and ask for advice. If the situation is considered extremely urgent, the Police should be contacted via a 999 call. If advice is sought through the MASH and/or the Police, then seek to establish contact with the DSL, Deputy DSL, Governor Safeguarding Lead or the Chair of Governors as soon as possible

## DEALING WITH DISCLOSURE BY A CHILD

If a child discloses to a member of staff an issue that has Safeguarding or Child Protection implications then:

- Listen** to the child, keeping calm and offering reassurance. The child should lead the discussion.
- Accept** what the pupil says without challenge, reassuring them that they are doing the right thing and that you recognise how hard it is for them.
- Consider using phrases such as "You've done the right thing" or "You're not to blame".
- Allow the child to talk but do not interrogate or ask leading questions; ask only open questions (such as "Can you tell me more about..."). Do not put forward your own ideas or use words that the child has not used before.
- Try to **clarify** details with them. Check out your understanding with the child of what has happened if you are not clear what the child is telling you.
- Use the words the child uses (e.g. for different parts of the body). If the child senses that you are reluctant to use particular words, they are likely to feel reluctant to use the words themselves, or may not speak at all.
- Do not promise confidentiality and therefore tell the child that you will have to tell someone else who will be able to help.
- Do not make promises about what might or might not happen next.
- Do not make apportion blame or display judgements about the people children refer to; they may be people they love.
- Do not lay blame or criticise either the child or the perpetrator.
- Try not to show any shock you might feel.
- Take what they say seriously.
- Reassure** them that they have done the right thing in telling you.
- Explain what will happen next and who you will need to talk to.
- Use a body map to record the position of any bruising or marks.
- If feasible and appropriate, establish details of full name, address and names of parents/guardians.

As general guidance, when talking to children who may have been abused, it is important to strike a balance between gathering enough information to establish whether or not there is a realistic cause for concern and undertaking an investigation interview which is the responsibility of the investigating agency. The role of the school is to establish whether or not there is a cause for concern; if that is the case then the fuller interview is more appropriate carried out by a social worker.

Record the conversation and facts verbatim in writing immediately afterwards (writing notes during the interview may put undue pressure on the child). Sign and date the report (The note should record the time, date, place and people who were present as well as what was said. This note may well be used in any subsequent court proceeding and may be required as evidence).

Report to the DSL or Deputy DSL as soon as possible.

After the disclosure, the Headteacher will ensure that appropriate support is given to the child, and the members of staff receiving and dealing with the disclosure and any bystander including any other child affected by a safeguarding or child protection incident.

## **DEALING WITH CONCERNS OF ABUSE OR NEGLECT AND EXPLOITATION**

If a member of staff is concerned that a child may be experiencing abuse or neglect and exploitation then, in general, the Headteacher or the class teacher should discuss these concerns in the first instance with the child's parents or carers. However, these concerns should not be broached if it is believed that this would place the child at greater risk or lead to a loss of evidence for a Police investigation. If the decision is made not to discuss concerns with parents, this must be recorded in the child's safeguarding file with a full explanation for that decision.

If abuse is suspected but there has been no disclosure, then, after discussion with the Headteacher, then it is the responsibility of the person with concerns to talk to the child. This "interview" should be conducted in a non-threatening private space and conducted by an individual who the child knows and is comfortable with. When talking to children, account must be taken of their age, level of understanding and preferred language, which may not be English. It is also important to consider how a child with SEND may need support in communicating.

It is appropriate to outline concerns and then ask the child casual open questions about the nature of the concerns. For instance: "Can you tell me about the bruises on your legs". It is important that the responses by the child are seen to be believed. If the response involves disclosure of abuse, then the advice on Dealing with Disclosure should be followed; in particular, the child should be reassured that they were right to talk to the member of staff.

In all cases, the facts and conversation must be recorded in writing immediately afterwards using the exact (not implied) words spoken. The Report should be signed and dated as it may be required subsequently for evidential purposes.

The report should then be passed to the DSL as soon as practical, even it is not clear whether concerns are substantiated or not. It is for the DSL to decide on the appropriate next steps which may include immediate referral or internal monitoring.

## **DISCUSSING CONCERNS WITH THE FAMILY AND THE CHILD**

As a general principle, it is important to be open and honest when dealing with parents. Parents have primary responsibility for the care of their children and, in most circumstances, parents should be informed as soon as possible about concerns regarding their children. However, in some cases of alleged or suspected child abuse it may not be appropriate for parents to be informed immediately, because it may prejudice the investigation. In such cases concerns should be reported to the Headteacher who will in turn contact the local Social Services Department.

Parents may react in many ways when they hear their child is suspected of being abuse; they may feel angry, threatened, indignant, depressed, ashamed or guilty, and it is important to understand that people have strong feelings in such circumstances.

When talking to parents who may be highly emotional, it is helpful to:

- Meet parents with the Headteacher.
- Be open and honest with parents and tell them about the reasons for concern;

- Be very specific regarding the information that it is wished to share.
- Explain to parents that it is the duty of a teacher to report cases of suspected abuse. It may be helpful to outline to them the procedures, so that professional guidelines are always adhered to; and
- Make a written record of the meeting, what was said and who was present (date/time etc.) for inclusion on the child's Safeguarding file.

## **ALLEGATIONS AGAINST STAFF**

The Headteacher, or Governors in a case where the Headteacher is accused of a safeguarding or child protection issue, should consider carefully whether the suspension of the person concerned is appropriate. Suspension should not be automatic. Further guidance on procedures when a Headteacher is accused of abuse is contained within the Child Protection Procedure Handbook. Advice should be sought from the Gloucestershire MASH in the first instance.

## **CONFIDENTIALITY PRINCIPLES**

As a guiding principle, any specific information on a child relating to Safeguarding or Child Protection matters should be restricted solely to those members of staff who have a direct locus in that child's welfare. Case management details will thus be restricted to the DSL, Deputy DSL, the member of staff reporting a concern and to any other members of staff who need to be aware because of their interaction with the child.

If a child confides in a member of staff and requests confidentiality it is important that the child is told sensitively that he/she has a responsibility to refer cases of alleged abuse to the appropriate agencies for the child's own sake. Within that context the child should however, be assured that the matter will be disclosed only to people who need to know.

Staff have a professional responsibility to share relevant information about the protection of children with other professionals, particularly investigating agencies. A member of staff who knows the child best should be prepared to contribute the school's knowledge of the child to a joint agency discussion.

Staff who receive information about children and their families in the course of their work should share that information only within appropriate professional contexts.

Children identified on Child Protection Register will be monitored in line with agreed Child Protection Plan. Appropriate personnel who are in direct contact with said child are to be informed and to notify the Headteacher as part of monitoring process. Reports prepared for such discussions should focus on the child's educational progress and achievements, attendance, behaviour, participation, relations with other children and, where appropriate the child's appearance. If relevant reports should include what is known about the child's relations with his or her family and the family structure. Reports should be objective and based on evidence. They should distinguish between fact, observation, allegation and opinion.

The procedures are laid down in the Safeguarding Children's Handbook (Child Protection Procedures); a copy is held in the School Office.

See also:

<https://www.gov.uk/guidance/data-protection-in-schools>

## **EARLY HELP POINTS OF CONTACT**

At Gastrells School the pupils' voice is always heard and listened to. For pupils who are non-verbal and have more profound difficulties we continually review and monitor their response as a team around the child. These are always acted upon.

This Annex provides points of contact and information available to support pupils (and their families) who may benefit from specialised interventions and practical help to enable them to fulfil their potential. Further guidance can be obtained from the DSL or Deputy DSL.

### **IN SCHOOL HELP**

- Links with the Gloucestershire Safeguarding Children's Executive
- Mental Health Champions Award
- Mental Health First Aiders
- Behaviour Lead and Behaviour Curriculum
- School Counsellor
- Safeguarding Policy and Procedures
- Early Years provision from two years old
- Stay and Play - To support and promote the all-round development of pre-school children with additional needs through fun activities
- Qualified and experienced staff in identifying the needs of students
- Dyslexia assessment programme
- Open door policy to parents
- On-site Parent Support Advisor
- Total communication coordinators
- Good communication between home and school
- The school work in partnership with multi-service agencies and educational specialists to ensure the best educational achievement and wellbeing for our pupils, including;
  - o School Doctor
  - o School Nurse
  - o Speech and Language Therapist
  - o Physiotherapist
  - o Occupational Health Therapist
  - o Teacher for the Hearing Impaired
  - o Teacher for Visually Impaired
  - o Education Psychologist
  - o Nurses from the Community Learning Disabilities Team (CLDT)
  - o Social Services
  - o Clinical Psychologists
  - o Family Support Workers (Families First)
  - o Counselling Service
  - o The Police, Harm Prevention Officer and local Police Community Support Officer
  - o Children and Young Persons Service
  - o The Education and Inclusion Team
  - o Gloucestershire Drug and Alcohol Service GDAS
  - o Gloucestershire Healthy Living and Learning (GHLL)

- Strong links with the Virtual School for Children in Care
- Access to a supportive PTA
- Links with charities;
  - o NSPCC
  - o Allsorts
  - o Inclusion Gloucestershire
  - o National Autistic Society
  - o PMLD LINK
  - o Winston's Wish

## **INFORMATION AVAILABLE**

- Comprehensive website
- Useful list of links on the website
- Contact details for support groups and charities
- Statutory Policies on our website

## **EARLY HELP FOR SPECIFIC AREAS;**

### **Emotional Abuse**

- Access to the SEAL resources [www.sealcommunity.org](http://www.sealcommunity.org)

### **Sexting**

- <https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>

### **Child Trafficking**

- <http://www.stophetraffik.org/campaign/education>

### **Physical and Domestic Abuse**

- GSCP Domestic Abuse Pathway
- <https://www.gdass.org.uk/>
- Gloucestershire Healthy Life and Living (GHLL) teaching and teacher resources <http://www.ghll.org.uk/resources/generic-resources/domestic-abuse-and-sexual-exploitation-resources-/>
  - o Domestic Abuse and Sexual Exploitation resources - including training for teachers
  - o Teenage Domestic Violence Resources
  - o Give and Get curriculum
- [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/276921/ThisIsAbuseDG.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/276921/ThisIsAbuseDG.pdf)
- <http://www.glostakeastand.com/types-of-abuse/domestic-violence-and-abuse/>

### **Neglect and exploitation**

- <http://www.nspcc.org.uk/>
- <http://www.childline.org.uk/Pages/Home.aspx> 0800 1111

### **FGM**

- Gloucestershire Healthy Life and Living (GHLL) teaching resources
- o FGM
- <http://www.glostakeastand.com/types-of-abuse/female-genital-mutilation/>

### **Forced Marriage**

- Under 18- Child Protection Procedure as per DSL guidance
- Police- Forced marriage is now a recognised criminal offence under the Anti-Social Behaviour Crime and Policing Act 2014
- Forced Marriage Protection Order
- Forced Marriage Unit
- www.glostakeastand.com
- Gloucestershire Monitoring Form www.gscb.org.uk
- <http://www.glostakeastand.com/types-of-abuse/forced-marriage/>

### **Faith based abuse**

- <https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief>

### **Sexual Exploitation and Sexual Abuse**

- <http://www.ghll.org.uk/resources/special-needs-resources/>
- Lead teacher for Sex, Relationships Education
- Access to Altered Ego (drama company) and production of Chelsea's choice
- Gloucestershire Healthy Life and Living (GHLL) teaching resources
- o POP! (teaching the dangers of alcohol)
- o Love or Lies
- o Give and Get Curriculum
- <http://www.glostakeastand.com/types-of-abuse/child-sexual-exploitation/>
- <https://ceop.police.uk/safety-centre/>

### **Child Exploitation**

- <https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>
- <https://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance>
- 

### **Online safety**

- [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)
- [www.disrespectnobody.co.uk](http://www.disrespectnobody.co.uk)
- [www.saferinternet.org.uk](http://www.saferinternet.org.uk)
- [www.internetmatters.org](http://www.internetmatters.org)
- [www.childnet.com/cyberbullying-guidance](http://www.childnet.com/cyberbullying-guidance)
- [www.pshe-association.org.uk](http://www.pshe-association.org.uk)
- [www.educateagainsthate.com](http://www.educateagainsthate.com)
- [www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation](http://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation)
- <https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>

### **Bullying**

- <https://www.gov.uk/government/publications/preventing-and-tackling-bullying>

### **Abuse**

- <https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>
- <https://www.gov.uk/guidance/domestic-violence-and-abuse>
- <https://www.disrespectnobody.co.uk/relationship-abuse/what-is-relationship-abuse/>

### **Children and the courts**

- <https://www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds>
- <https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds>

### **Children Missing Education**

- <https://www.gov.uk/government/publications/children-missing-education>

### **Further information and links can be found on Page 86 and 87 of Keeping Children Safe in Education September 2025**

[Keeping children safe in education 2025](#)

### **NSPCC**

The NSPCC is working with the Department of Education to provide a bespoke helpline for children and young people who've experienced abuse at school, and for worried adults and professionals that need support and guidance. If you are concerned about something, you can contact the NSPCC helpline Report Abuse in Education on 0800 136 663 or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

## **ANNEX D**

### **THE PREVENT (RADICALISATION AND EXTREMISM) DUTY**

#### **Introduction**

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. Exploitation is defined as “Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect of different faiths and beliefs”. Also included in the definition is reference to extremist calls for the deaths of members of our Armed Forces, whether in this country or overseas.

The current threat from terrorism in the UK includes the exploitation of vulnerable people, including children, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children vulnerable to future manipulation and exploitation.

The school is subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), especially paragraphs 141-210 in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the “Prevent Duty” and all guidance can be found here: [https://assets.publishing.service.gov.uk/media/65e5a5bd3f69457ff1035fe2/14.258\\_HO\\_Prevent+Duty+Guidance\\_v5d\\_Final\\_Web\\_1\\_.pdf](https://assets.publishing.service.gov.uk/media/65e5a5bd3f69457ff1035fe2/14.258_HO_Prevent+Duty+Guidance_v5d_Final_Web_1_.pdf)

#### **Indicators of a Child at Risk of Radicalisation**

- Showing sympathy for extremist causes
- Glorifying violence, especially to other faith or cultures
- Making remarks about being at extremist events or rallies
- Evidence of possessing illegal or extremist literature
- Advocating messages similar to illegal organisations or other extremist groups
- Out of character changes in dress, behaviour and peer relationships

- Secretive behaviour
- Online searches or sharing extremist messages or social profiles
- Intolerance of difference, including faith, culture, gender, race or sexuality
- Work or writing that displays extremist themes
- Attempts to impose extremist views or practices on others
- Advocating violence towards others.

## **Response to Concerns**

Gastrells Community Primary School is aware of its obligations under the Prevent Duty and is clear that the threat of exploitation and radicalisation should be viewed as a safeguarding concern. As a school we recognise that we have an important part to play in educating children about extremism and recognising when pupils start to become radicalised.

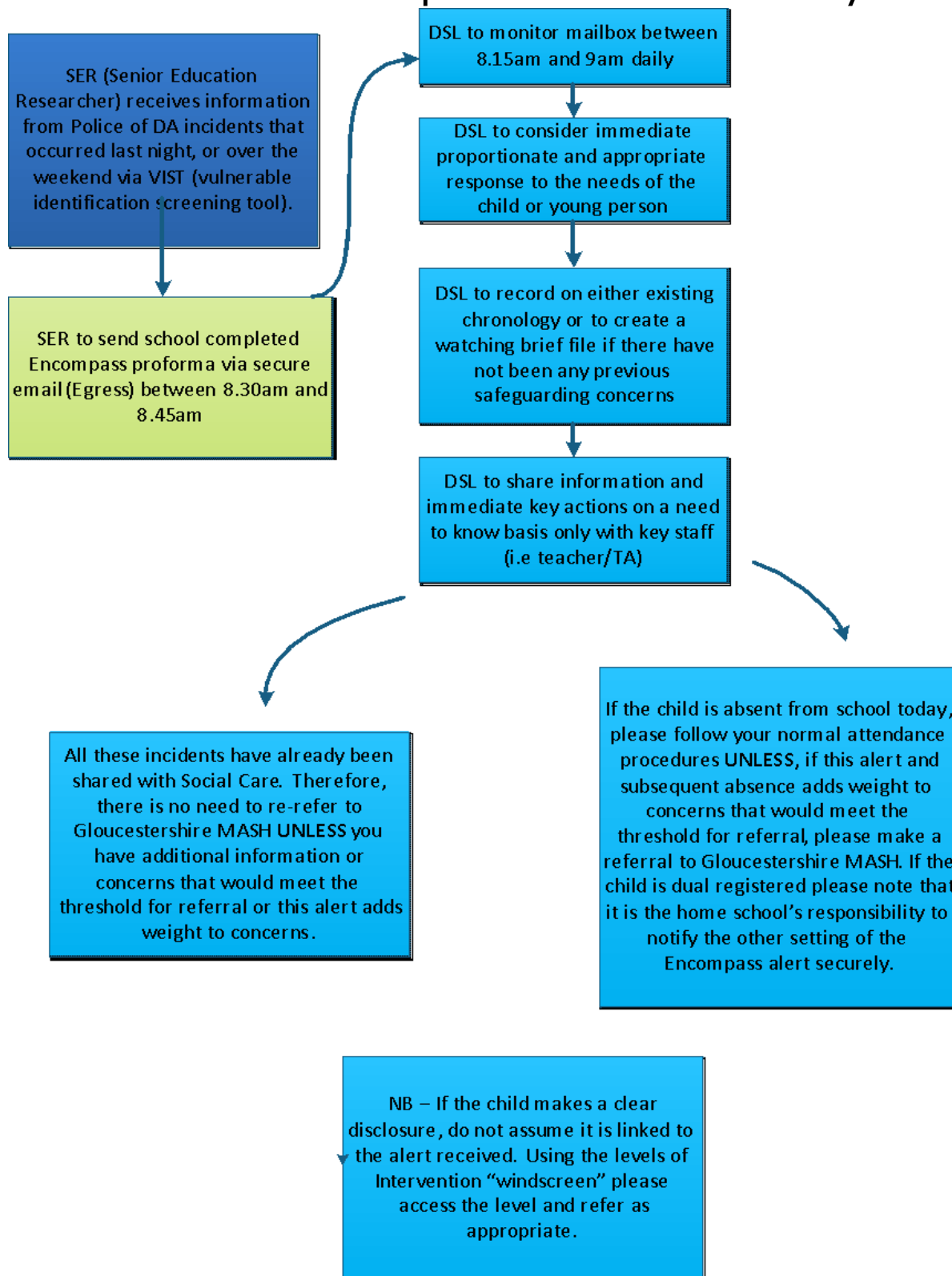
We ensure, through the school vision, ethos, values, rules, curriculum and teaching that:

- Tolerance and Respect for all cultures, faiths and lifestyles are promoted.
- Governors ensure that this ethos is reflected and implemented effectively in school policy and practice.
- Pupils who attend our school have the right to learn in safety. We do not tolerate bullying of any kind and will challenge derogatory language and behaviour towards others.
- Visitors who are invited to speak to our pupils will be informed about our ethos and safeguarding procedures and relevant vetting checks will be undertaken. We undertake due diligence to ensure that visiting speakers are appropriate; and
- We are alert to the use of the internet, including social media, by extremists to share their messages and we both monitor the use of our internal IT systems and also educate our pupils about the risks of exploitation through the internet.

All staff are aware of our obligations under the Prevent Duty and are alert to the potential indicators of exposure to radicalisation and extremism. If any child does demonstrate any radical or extremist views, the matter is to be reported immediately to the DSL who will seek advice (through the Gloucestershire MASH) to the Local Authority Channel Panel; this Panel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist-related activity.

## Annex E

# Gloucestershire Encompass School Pathway



## **ANNEX F**

### **FAQs ON LOW-LEVEL CONCERNS**

#### **Should staff who share concerns be able to remain anonymous?**

If the staff member who raises the concern does not wish to be named, then the organisation should respect that person's wishes as far as possible. However, there may be circumstances where the staff member will need to be named (for example, where it is necessary to carry out a fair disciplinary process) and, for this reason, anonymity should never be promised to members of staff who share low-level concerns. Where possible, organisations should try to encourage staff to consent to be named, as this will help to create a culture of openness and transparency.

#### **Should staff share concerns about themselves (i.e. self-report)?**

Occasionally a member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, a member of staff may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the staff code of conduct. Self-reporting in these circumstances can be positive for a number of reasons: it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity; it demonstrates awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived; and, crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

#### **How should a low-level concern be responded to by the Headteacher?**

Once the Headteacher/Principal or Safeguarding Lead has received the low-level concern, they should (not necessarily in the below order but in an appropriate sequence according to the nature and detail of relating to the behaviour should be placed and retained on the staff member's personnel file, whilst also being retained on the central low-level concerns file. In the case of (i), a duplicate of all previous records of low-level concerns relating to the same individual from the central low-level concerns file should be placed in the staff member's personnel file. Material on the personnel file should be retained so that the school can produce a clear and comprehensive summary of all allegations (except those which are found to have been malicious), details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, to be kept on the confidential personnel file of the staff member, and a copy provided to them.

Low-level concerns should be retained on an organisation's central low-level concerns file (securely and applying appropriate access restrictions) unless and until further guidance provides otherwise. However, when a staff member leaves and/or takes up new employment, that creates a natural point at which the content of the file may be reviewed to ensure it still has value (either as a safeguarding measure or because of its possible relevance to future claims), and is, therefore, necessary to keep the particular concern shared with them):

(a) speak to the person who raised the concern (unless it has been raised anonymously), regardless of whether a written summary, or completed low-level concerns form has been provided.

(b) speak to any potential witnesses (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted);

(c) speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted);

(d) review the information and determine whether the behaviour (i) is entirely consistent with their staff code of conduct and the law, (ii) constitutes a low-level concern, (iii) is not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO, and on a no names basis if necessary, (iv) when considered with any other low-level concerns that have previously been raised about the same individual, could now meet the threshold of an allegation and should be referred to the LADO/ other relevant external agencies, or (v) in and of itself meets the threshold of an allegation and should be referred to the LADO/other relevant external agencies;

(e) where they are in any doubt whatsoever, seek advice from the LADO - on a no-names basis if necessary.

(f) make appropriate records of:

- all internal conversations – including with the person who initially shared the low-level concern (where this has been possible), the adult about whom the concern has been shared (subject to the above), and any relevant witnesses (subject to the above);
- all external conversations – for example, with the LADO/other external agencies (where they have been contacted, and either on a no-names or names basis);
- their determination (as above at 8.20(d));
- the rationale for their decision; and
- any action taken

The Headteacher's approach should also be informed by the following:

- If it is determined that the behaviour is entirely consistent with the organisation's staff code of conduct and the law:
  - (a) it will still be important for the Headteacher to update the individual in question and inform them of the action taken as above;
  - (b) in addition, the Headteacher should speak to the person who shared the low-level concern – to provide them with feedback about how and why the behaviour is consistent with the organisation's staff code of conduct and the law;
  - (c) such a situation may indicate that:
    - the staff code of conduct is not clear;
    - the briefing and/or training has not been satisfactory; and/or
    - the LLC policy is not clear enough.

If the same or a similar low-level concern is subsequently shared by the same individual, and the behaviour in question is also consistent with the staff code of conduct, then an issue may need to be addressed about how the subject of the concern's behaviour is being perceived, if not about the behaviour itself, and/or the school may need to look at the implementation of its LLC policy.

If it is determined that the behaviour constitutes a low-level concern:

- it should also be responded to in a sensitive and proportionate way – on the one hand maintaining confidence that such concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from any potential false allegations or misunderstandings. Any investigation of low-level concerns should be done discreetly and on a need-to-know basis;

- most low-level concerns by their very nature are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action. Others may be most appropriately dealt with by means of management guidance and/or training;
- in many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised.
- any such conversation should include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate;
- some low-level concerns may also raise issues of misconduct or poor performance. The Headteacher should also consider whether this is the case – by referring to the organisation's disciplinary and/or capability procedure and taking advice from HR on a named or no-names basis where necessary. If the Headteacher considers that the school's disciplinary or capability procedure may be triggered, they should refer the matter to HR. Any such referral should be made by the Headteacher having received the low-level concern and not by individual staff members. Equally, it is essential that there is close liaison and appropriate information sharing between the Headteacher and HR, so that a holistic view of the individual can be taken. Where a low-level concern does not raise misconduct or poor performance issues, it will not be a matter for HR;
- some concerns may trigger the organisation's disciplinary, grievance or whistleblowing procedures, which should be followed where appropriate. Where low-level concerns are raised which in fact require other internal processes to be followed, it is sometimes difficult to determine how best to investigate the concern and which procedure to follow. Schools should exercise their professional judgement and, if in any doubt, they should seek advice from other external agencies including the LADO;
- if HR advise that the organisation's disciplinary procedure is triggered, organisations must ensure that the individual has a full opportunity to respond to any factual allegations which form the basis of a disciplinary case against them. If an organisation ultimately disciplines or dismisses a staff member for cumulative alleged 'breaches' of the staff code of conduct which were not brought contemporaneously to the individual's attention, and to which they have not had a proper opportunity to respond, clearly there will be a lack of fairness and natural justice and the risk of a finding of unfair dismissal by an Employment Tribunal.

However, if it is determined that the behaviour:

- whilst not sufficiently serious to consider a referral to the LADO nonetheless merits consulting with and seeking advice from the LADO, and on a no-names basis if necessary, then action (if/as necessary) should be taken in accordance with the LADO's advice; or

- when considered with any other low-level concerns that have previously been shared about the same individual, could now meet the threshold of an allegation, or in and of itself meets the threshold of an allegation, then it should be referred to the LADO/other relevant external agencies, and in accordance with the school's safeguarding policy.

## How long to keep records and how?

Schools should retain all records of low-level concerns (including those which are subsequently deemed by the Headteacher to relate to behaviour which is entirely consistent with the staff code of conduct) in a central low-level concerns file (either electronic or hard copy). Where multiple low-level concerns have been shared regarding the same individual these should be kept in chronological order as a running record, and with a timeline alongside. These records should be kept confidential and held securely, with access afforded only to a limited number of individuals such as the Headteacher, and the individual they report to.

The Headteacher may store the central low-level concerns file with the other safeguarding and child protection records. The rationale for storing such records on a central file, rather than in staff members' personnel files, is that (a) it makes it easier to address possible issues and (ii) review the file and spot any potential patterns of concerning, problematic or inappropriate behaviour; and (b) it reassures staff and encourages them to share low-level concerns.

Specifically, if a referral is made to the LADO/other external agencies where the behaviour in question: (i) had not originally been considered serious enough to consider a referral to the LADO but merited consulting with and seeking advice from them; (ii) is determined to meet the threshold of an allegation when considered with any other low-level concerns that have previously been raised about the same individual; or (iii) in and of itself meets the threshold of an allegation then records

References (updated Jan 2026):

- Keeping children safe in education (KCSIE) 2025:  
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- Working Together to Safeguard Children (Dec 2023):  
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- Prevent duty guidance (2023): <https://www.gov.uk/government/publications/prevent-duty-guidance>
- Channel duty guidance (2023): <https://www.gov.uk/government/publications/channel-and-prevent-multi-agency-panel-pmap-guidance>
- DfE Filtering and Monitoring Standards: <https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges>
- DfE Cyber Security Standards: <https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/cyber-security-standards-for-schools-and-colleges>
- Working together to improve school attendance (statutory from 19 Aug 2024):  
<https://www.gov.uk/government/publications/working-together-to-improve-school-attendance>
- UKCIS "Sexting in schools and colleges" (2016) advice:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/647389/Overview\\_of\\_Sexting\\_Guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/647389/Overview_of_Sexting_Guidance.pdf)
- Data protection in schools (DfE): <https://www.gov.uk/guidance/data-protection-in-schools>