POLICY: Child Protection and Safeguarding Policy

STATUTORY: Yes

DATE AGREED: September 2026

REVIEW DATE: July 2027

RESPONSIBLE MEMBER OF STAFF: A Williams

TRUSTEE COMMITTEE: Full Trustee Board

SIGNED HEADTEACHER: J Holmes

SIGNED CHAIR OF TRUSTEES: M Clayton

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1. Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Andrew Williams	safeguarding@jmhs.hereford.sch.uk andy.williams@jmhs.hereford.sch.uk
Deputy DSL	Tahnia Khanom	safeguarding@jmhs.hereford.sch.uk tahnia.kahnom@jmhs.hereford.sch.uk
Local authority designated officer (LADO)	Lynette Niles	LADO@herefordshire.gov.uk Lynette.niles@herefordshire.gov.uk 01432 260800
Chair of trustees	Mike Clayton	chair@jmhs.hereford.sch.uk
Lead safeguarding link trustee	Stuart Mitchell	stuart.mitchell@jmhs.hereford.sch.uk
Channel helpline		020 7340 7264
Herefordshire Integrated Front Door team (formerly MASH)	Integrated Front Door (formerly MASH)	01432 260800

2. Aims

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare, to provide help and support to meet the needs of children as soon as problems emerge
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognizing and reporting safeguarding issues
- To protect children from maltreatment inside or outside the home including online
- To work effectively with safeguarding partnership and other external professionals

3. Legislation and statutory guidance

Fundamentally this policy is rooted in the principals of the United Nations Conventions on the Rights of the Child which makes it clear that a child has a right to be protected from abuse and neglect (Article 19) and sexual exploitation (Article 34). There is also an acknowledgement to a range of other fundamental rights including those to freedom of thought, expression, privacy, education and conscience.

- This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education2026 and Working Together to Safeguard Children 2026, We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.
- This policy is also based on the following legislation:
- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015,
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what regulated activity' is in relation to children
- Keeping Children Safe in out-of-school settings 2020
- DFE statutory guidance on schools working with Alternative providers https://www.gov.uk/government/publications/alternative-provision
- Restrictive interventions, including use of reasonable force in schools 2026
- Data protection Act 2018; Data (Use and Access) Act 2025; UK GDPR
- Online Safety Act 2023
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism (updated in 2023.)

Furthermore, this policy has been developed in accordance with the principles of the following documents:

- The Education Act 2002 s175/s157 and 2011
- Equalities Act 2010
- Dealing with Allegations of Abuse (DfE 2012);
- Sexual Violence and sexual harassment between children in schools and colleges May 2018
- Children missing education: statutory guidance for local authorities and schools Sept 2025
- Criminal exploitation of children and young adults: Home office County Lines guidance 2023
- UKCCIS Guidance: "Sexting (now more commonly referred to as youth produced sexual imagery) in schools and colleges, responding to incidents, and safeguarding young people" (2024) plus Government guidance on advice for education settings on sharing nudes and semi-nudes (2020)
- Child Act 1989: Private Fostering guidance
- Teaching online safety in school (DfE 2023)
- Statutory guidance on Relationships education, Relationship and Sex Education (RSE) and Health education (DfE 2025)
- Promoting and supporting mental health and wellbeing in schools and colleges (2026)
- Home Office guidance on Preventing youth violence and gang involvement (2013
- Searching, screening and confiscation advice for Headteachers (2022)
- Use of reasonable force; Advice for Headteachers and Governing bodies (JULY 2013)
- European Convention on Human Rights Act and in particular Articles 3, 8,14 and Protocol 1 Article 2 which lay out all our rights in terms of freedom from inhuman and degrading treatment, discrimination and respect for private and family life. Protocol 1 stresses the individuals' right to an education.
- Herefordshire Right Help Right Time / levels of need framework 2025 which outlines arrangements and protocols of the Herefordshire Safeguarding board which the school follows. Herefordshire local authority works in conjunction with the West Midlands regional safeguarding partnership.

4. Definitions

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment
- Preventing impairment of children's health or development (including mental health)
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

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

Victim - This policy may refer to the term victim for those subject to abuse or alleged abuse but recognizes that not every victim will perceive themselves a such.

Perpetrator - This term should always be used with caution when addressed at an alleged abuser as in many cases the abusive behaviour in question will also be harmful to the perpetrator and victim

Children includes everyone under the age of 18.
The following 3 **safeguarding partners** will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- An integrated care board group for an area within the LA
- The chief officer of police for a police area in the LA area

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Witnessing domestic abuse and or the ill treatment of others is also a form of 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. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. It includes conveying feelings of unloved and inadequacy, not allowing the young person a voice and exposing them to Domestic Violence and harm to others. Serious bullying and online bullying can constitute emotional abuse.

Sexual Abuse involves enticing or forcing a child to take part in sexual activities and exists on a continuum of harmful sexual behaviours, sexual harassment and abuse plus rape. It includes the encouragement of children or grooming a child in preparation for abuse and can exist in consensual and nonconsensual circumstances.

Physical abuse may involve hitting, shaking, throwing, poisoning, burning, suffocation, scalding and drowning. It also includes the fabrication of medical symptoms and deliberately inducing illness. The online encouragement of self harm dangerous "hazing" challenges should also be considered as physical abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. . Neglect may occur during pregnancy as a result of maternal substance abuse. It can take the form not providing adequate food and basic requirements, abandonment from home and failure to provide adequate protection, medical attention or supervision.

Domestic abuse/ violence since 2021 has been recognised as a significant harm on those young people who witness it. The law applies to all types of adult relationship where both people are over 16 (This does not dismiss TRA teenage relationship abuse as significant). Police have a statutory duty where they attend DV and a child is present to notify the school.

Homelessness – For young people who find themselves unable or excluded from living in family home local social care must lead on an intervention with DSL supporting the correct referrals. Schools should seek to ascertain whether a young person has voluntary withdrawn themselves from family home and whether or not the threshold for private fostering has been met by their new living arrangements.

Sexting (also known as youth produced sexual imagery or sending nudes) is the sharing of sexual imagery (photos or videos) by children. This is now formally referred to in KCSIE 2026 as the making or sharing of nudes or semi-nudes including AI generated or digitally altered images.

Child sexual Exploitation (CSE) - a form of abuse where advantage is taken of an in balance of power to coerce, manipulate or deceive a young person into sexual activity. It can coexist alongside CCE.

Child criminal exploitation (CCE) - a form of abuse where a child is controlled, coerced, manipulated or deceived into criminal activity often for the benefit of another (eg county lines drug trafficking).Staff should be vigilant to signs such as students spending significant times missing or away from home, plus what appears as unaccounted for cash transfers and purposes. See page 163 of KCSIE.

'Honour-based' violence HBV) (including FGM and forced marriage) - encompasses incidents or crimes committed- to protect or defend the honour of the family and/or community, including FGM/female circumcision, forced marriage, and practices such as breast ironing. Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBV are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBV or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures**.**

Contextual Safeguarding: The school accepts the importance of considering the wider environmental factors in our students' lives that may threaten their safety and welfare, this is referred to as contextual safeguarding. The school acknowledges the specific contextual risks that are specific to our location. This awareness does not detract from our core belief that any form of abuse could happen here to anyone. Currently data and intelligence would suggest:

- Anti-social and possible gang/hazing type behaviour particularly out of school hours on the towns Recreational ground and derelict buildings. The inappropriate use of aerosols in terms of fire lighting and the obtaining of illegal vapes and alcohol.
- A small group of students using rail connections out of the town to "abscond" and potentially put themselves at risk of anti-social and harmful sexual behaviours in Malvern, Worcester or Hereford but possibly beyond the region.
- The use of Class C and possibly B drugs and the potential risk of CSE in the form of "county lines" again centred but not wholly around the towns recreational ground.
- The existence and exchanging of "Youth produced sexual images" and the repercussions thereof plus a sometimes-misogynistic undercurrent that runs alongside some of these behaviours. The emergence of AI as a tool to generate such images.
- The open nature of the site and its proximity to town centre leading to the potential for truancy out of school particularly of high-risk students. Plus increases the risk of ex-students, parents and others known to be risk factors accessing students.
- There will be several classes and groupings of students that may pose greater vulnerability for child-on-child abuse, for example single gender dominated classes or inclusion facilities where there may be concentrations of vulnerable young people.
- The rising influence of online communities including those referred to as the "Manosphere" and the "COM " which can lead to mental health implications and unsafe behaviours. A small but rising number of students who may be demonstrating behaviours which could be defined as toxic masculinity and or misogynistic.
- The exposure of young people in the school to DV in their home settings and or abuse surrounding parental relationship differences.
- The significant high level of nonattendance of a small group of students who are deemed vulnerable
- The presence of Extreme Right-wing groups is considered the biggest Radicalisation and counter terrorism concern currently in the region.

5. Equality statement

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

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities (see section 9)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality (LGBQT+) this includes a perceived sexual identification
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence

- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after or in a private fostering arrangement
- Students who have been subject to significant and or numerous ACE's (Adverse childhood experiences)
- Students who may have parents and carers within the prison system
- Students who have experienced numerous ACE's (Adverse Childhood experiences)

All students who may be vulnerable as are result wholly or partly due to such protected characteristics should be identified by Year leaders and or safeguarding team, as possibly requiring a key trusted adult in school from within or beyond the pastoral team. Also, staff should be made aware on a need-to-know basis if the vulnerability requires adaptive teaching or pastoral responses.

In terms of sport the Equality Act of 2010 provides exemption for decisions made by the school about single gender sport provision as outlined in paragraphs 94-97 of the KCSIE 2026 due to become a statutory version of policy in September.

Also, in line with the regulations and safeguarding requirements relating to school premises the school will not allow children into toilets/ changing spaces designated for the opposite gender including where schools are responding to request to support any social transitioning of gender recognition. No child 11or over should be expected to undress in front of students of the opposite gender. Beyond these exemptions the school will decide on a case-by-case basis alongside families and the young person where modifications are requested on the basis of gender identification.

6. Roles and responsibilities

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

6.1 All staff

All staff will read and understand part 1 of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually. All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the JMHS Code of Conduct the role and identity of the designated safeguarding lead (DSL) and deputy, the behaviour policy, Online safety policy.
- The early help process and Family First programme as it evolves in the local area and their possible role in supporting Early help and support for young people and their families. On writing this policy an understanding of the existing local "Right Help Right Time" policy document and the provision it lays out for local support (for Herefordshire based students) is required.
- The process (i.e MARF)for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play. This will require an understanding of local thresholds of need.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals in and out of school.
- The signs of different types of abuse, exploitation and neglect, as well as specific safeguarding issues, such as child exploitation (CSE and CCE), indicators of being at risk from or involved with serious violent crime, FGM, and radicalization.
- The significant risks and impacts of the online environment in posing potential harm for young people and how they can be mitigated. This includes the practice of sending nudes, financially motivated sexual extortion, AI generated online harmful material (deep fake images). Staff communicating with parents on matters like this should be aware of online safety measures as

outlined in Online Safety policy. Staff should know the standards of filtering and monitoring in the school and their vital role in quality assuring and informing this.

- The existence of Child-on-Child abuse prevalent at some level in all UK schools plus the structures and responses in place within school to identify and respond to such incidents including their reporting in the same manner as other safeguarding and child protection concerns.
- How to use the schools My Concern online reporting platform for making referrals and keeping updated with local and national policies related to safeguarding. Staff should use professional judgement and or consult with safeguarding team members as to if and when certain behaviours and observations have indeed crossed a threshold and therefore need recording. They should not assume that an MC recording of a concern will always be "actioned" within the school day that it has been recorded and therefore a verbal referral would be required.
- All staff should also have an awareness of the impact of poor mental health on Young people. and their academic and personal development, plus be aware of how to guide, signpost and advise students and parents within the school therefore promoting good mental well being. They should be aware that concerns re poor mental health may need to be reported as any other a safeguarding concern especially where they suspect suicidal thoughts /intent and self harming practises. Education staff are not expected to diagnose or treat mental health problems but should be aware of the response to mental health issues including prevention in the school
- All staff should be aware and operate the correct protocol for receiving visitors and volunteers, new staff and other outside agencies into the school. Staff must complete visitor portal and alert DSL and Reception
- All staff are responsible for reading training updates from the DSL and completing awareness quizzes and surveys in a timely fashion and therefore have a broad understanding/awareness of a range of behaviours associated with child exploitation, drug use, domestic violence and other forms of abuse and neglect
- Teaching staff in particular should seek to know and understand various levels of vulnerability within their classes in terms of CLA, PCLA status, PP and FSM status plus current safeguarding profiles, levels of trauma and ACES plus any safety plan implications for key students. Also, the key vulnerabilities that can arise from LGBT and refugee status. All staff should also be made aware (on a need to know basis) of the possible need for additional support for students who may be pregnant or a young carer. They should be aware of the additional support that may be required for those exhibiting early signs of anti-social and unsafe behaviours and those with certain health conditions, specific educational needs which may or may not be formally recognised on an EHCP. Staff also should be aware (where they have been notified) if a student has had unaccounted periods of absence, has been identified as at risk of exploitation, modern slavery, drug misuse, FGM. Forced marriage and radicalisation (open to PREVENT referrals) or is deemed to be a privately fostered child.
- All staff should actively play their role in fostering a climate of transparency where concerns about colleagues and other staff members in the school community are shared appropriately and correctly. All staff need to be fully aware of their responsibilities in registering any low level concerns, they may have about colleagues working in the school and to disclose their own potential conflicts of interest and their own inadvertent actions that may lead to safeguarding issues
- All staff (even those not specifically trained) should have an understanding of the law and policy surrounding the physical restraint, seclusion and positive handling of children in the school environment
- All staff should know their role within school in terms of the PREVENT agenda and update their training in this area
- All staff and teaching staff in particular have a role in delivering a curriculum across all subject areas including PSHRE that aims to prevent incidents of discrimination, hate crime, extremism, plus inappropriate and harmful sexual behaviours. This preventative work will help support the school's zero tolerance approach in this area.
- All staff should be fully aware and compliant with the expectations to keep timely and accurate registers of attendance and the vital role this plays in safeguarding
- All staff should be punctual to any break or lunch duty that forms part of their contract and understand that this function is vital in monitoring and reducing potential child-on-child abuse.

- All staff working closely with students should seek to be “professionally curious” in terms of their observations and subsequent discussions with young people. They should not accept potential harmful behaviours as normal or just banter.
- All staff should be aware of confidentiality requirements listed in section 6. Staff must also be aware and confident that sharing data in the name/ intent of child protection and safeguarding. Data protection law does not prevent lawful and proportionate information sharing for safeguarding purposes.
- All staff should have some understanding of the impact of trauma on a student’s emotional and psychological (trauma informed).

6.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is currently Andy Williams. The DSL takes lead responsibility for child protection and wider safeguarding. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. He can be contacted on 01531 631012 or via email to andy.williams@jmhs.hereford.sch.uk. The Deputy DSL Tahnia Khanom will deputise for the DSL Monday – Thursdays between 9am and 4:30pm. Other members of safeguarding team will deputise on Friday or at any other in the event of Andy Williams not being available. Duty members of SLT and staff will be aware of safeguarding staff availability.

(All DSL level 3 staff have full access to the My Concern system). A universal safeguarding email safeguarding@jmhs.hereford.sch.uk exists to ensure in the absence of DSL, communication with the Safeguarding Team can continue. During school holidays and any unplanned extended absence of the DSL the details and rota in terms of Safeguarding Duty officer will be made available to stakeholders including Herefordshire Children’s partnership

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

- Provide advice, training and support to other staff on child welfare and child protection matters.
- Take part in strategy discussions and other inter-agency meetings and/or support other staff to do so.
- Refer suspected cases, as appropriate, to the relevant body (local authority children’s social care (Integrated Front Door (MASH) or CHAT), Channel programme, Disclosure and Barring Service, Get Safe Herefordshire Exploitation team, and/or police), and support staff who make such referrals directly, cooperating in terms of providing as much detail and context about each case. (Also taking note of concerns that may fall under jurisdiction of neighbouring Children’s authorities).
- Take overview of the My Concern system and its effectiveness in flagging, prioritizing, categorising and responding to concerns. The DSL will decide on “filing” a concern only when satisfied with justification for closure.
- Managing the safeguarding aspects of the school SDP and liaising regularly with link Trustee and or Chair of Trustees with its progress and the monitoring of key areas of the safeguarding teams work generally.
- Lead on the prompt transfer of student safeguarding files (and earlier alerts) on to new providers both at end of key stage and in year transfers. The DSL will work with post 16 and primary liaison teams to establish clear and consistent transfer (including in year transfers).
- Ensuring a training log for key accredited safeguarding courses is maintained.
- Line manage the Head of PSHE and team on all aspects of student education for safeguarding within the PSHE/RSE curriculum (Preventative education) and more broadly (including equalities education) and ensuring inclusivity and appropriate age / stage provision.
- Have an overview with the network manager and lead online safeguarding teacher of online safeguarding strategies in relation to online CONTENT, CONTACT and CONDUCT. This includes overall responsibility for monitoring and filtering of school devices and networks and ensuring all stakeholders know their role in this area to deliver the DFE standards in monitoring and filtering. Produce and maintain an online safety policy. The effectiveness of filtering and monitoring to be reviewed at least once per academic year (360 review) alongside IT support and other stakeholders including checks and records of checks across relevant internet connected devices.
- Ensuring parents and other stakeholders are aware of the schools safeguarding policies and procedures through effective communications.

- Ensuring that, and supporting Year leaders to, respond appropriately where incidents go beyond the limits of behaviour policy and require a response in terms of Child-on-child abuse. Ensuring that the school's protocols and understanding matches that of section 5 KCSIE – Understanding Harmful sexual behaviour.
- Ensuring that staff (on a need-to-know basis) are aware of students who are deemed vulnerable and therefore have the potential to trigger (or have already triggered) a safeguarding concern.
- The DSL will also keep the headteacher and SLT regularly informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate. They will oversee all referrals including Police, MARF referrals and Prevent/Channel referrals and authorise any filing/closure of an individual concern (with recoded justification).
- Enabling Student and parent voice to form a valuable input of any work in these areas plus maintain a web page on school website where safeguarding support services can be signposted and an updated school "Early Help Offer" is easily accessed. The DSL is responsible for fostering and supporting a Family First approach.
- Work closely with Herefordshire Children's Services in terms of accessing good supervision raising concerns appropriately where the school believes their response has not been sufficient and representing the school where possible at local area MAG meetings and county wide conferences where appropriate.
- Ensure that communication coming into the school from outside agencies such as operation encompass files relating to impacts of domestic abuse are shared with key individuals and recorded.
- Work with and monitor the work of the school lead on Mental health, and the Designated teacher for Children Looked After and Previously looked after.
- Oversee the work of those staff with a responsibility for and take overall responsibility and accountability for the online safety policy including the filtering/monitoring systems and use of online resources in the school.
- Ensuring that staff reviewing monitoring and updating responses to both Children absent from education and those Children Missing from education (e.g. EWO and attendance officers) are notifying authorities accordingly. This includes those students who are looking to pursue Elective Home Education. It is the duty of the DSL to escalate unexplainable and or persistent absences to be assessed as possible safeguarding concerns and trigger self and well visits and communications where necessary.
- Work with the School Human Resources manager to ensure the effective monitoring of the single central record and on all aspects of safer recruitment,
- Support and oversee the School Business Manager and other staff managing the use of school premises for non-school activities i.e. currently JM Sport and the theatre space in order that all lease/hire agreements outline the expectation that govt guidance "Keeping Children Safe in out of school setting" is adhered to,
- Similarly, the DSL must ensure that the school is compliant with safer sourcing and coordination of Alternative Curriculum provision and that safeguarding standards are fit for purpose in any alternative setting. Recording and conducting risk assessment visits, checks and updates and therefore fulfilling the requirements of the DFE statutory guidance in this area https://www.gov.uk/government/publications/alternative-provision
- To support the headteacher and human resources in creating systems and an environment where staff feel supported and secure in raising low level concerns about all adults working within the school environment they may encounter,
- To act as a Family First Lead practitioner where appropriate in line with new Family First Partnerships being adopted by all local authorities.
- Use the escalation policy if not satisfied or concerned about the outcomes of assessments on families and young people undertaken by the authority.

The full responsibilities of the DSL and deputy are set out in their job description. Other staff with DSL qualification are:

Mrs Tahnia Khanom (DDSL)
Mr Dean Wyatt (DSL accredited) Assistant Headteacher & SLT Behaviour and Attendance Lead
Mr Mathew Carter (DSL accredited) Year Leader

Mrs Natalie Crickett (DSL accredited) Sixth Form Pastoral Lead
Mr Mathew Day (DSL accredited) Year Leader
Mrs Chloe Limbrick (DSL accredited) Deputy Headteacher
Mrs Hayley Newnes (DSL accredited) Assistant Headteacher & SENDCO
Miss Ami Phillips (DSL accredited) ESLT& Head of Sixth Form
Mrs Karen Barker (DSL accredited) Year Leader
Miss Nicole Drew (DSL accredited) Year Leader
Mrs Trinity Fletcher (DSL accredited) Year Leader

6.3 The board of trustees

The board of trustees will approve this policy at each review, ensure it complies with the law and hold the headteacher to account for its implementation.

The Board of Trustees will appoint a senior board level (or equivalent) lead to monitor the effectiveness of this policy in conjunction with the full Board of Trustees. This is always a different person from the DSL. The current designated safeguarding trustee is Mr Stuart Mitchell. They can be contacted via email at Stuart.mitchell@jmhs.hereford.sch.uk The chair of trustees will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 2).

Trustees should work with the DSL to ensure they have the correct training, information and guidance to successfully perform a strategic and quality assurance role in all aspects of safeguarding and child protection- in particularly

All trustees will read Keeping Children Safe in Education.

6.4 The headteacher

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

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction.
- Communicating this policy to parents when their child joins the school and via the school website.
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly,
- Acting as the 'case manager' in the event of an allegation of abuse made against another staff member
- Ensuring there is adequate "supervision" for the DSL in terms of Line Management, Link Trustees and partnerships with other schools and providers. This supervision should ensure the quality assurance of all procedures but also the wellbeing of staff working in often "challenging" circumstances.

7. Confidentiality

In terms of confidentiality JMHS protocol is outlined as follows, and adheres to statutory guidance, Information Sharing Duty, published 10 September 2026, and came into effect 30 September 2026:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 does not prevent, or limit, the sharing of information for the purposes of keeping children safe, if proportionate.
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share

information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy).
- Confidentiality is also addressed in this policy with respect to record-keeping in section 13, and allegations of abuse against staff in appendix 2.

8. Recognising abuse and taking action

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

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

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

Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.** Tell the DSL (see section 1 and 6.2) as soon as possible if you make a referral direct and record concern and your immediate actions on to My Concern. Whenever possible please leave referrals to outside professionals including police to the DSL team. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. For staff who have limited or no access to My Concern for example Invigilators, Governors and some contracted staff- concerns can be raised directly to safeguarding leads within school or using the safeguarding@jmhs.hereford.sch.uk.

The contact number for the Herefordshire Integrated Front Door (formerly MASH) team is 01432 260800. If a child is not a resident of Herefordshire, please still use this contact number. The following link may be useful:
https://www.gov.uk/report-child-abuse-to-local-council

When completing a MARF (multi agency referral form) it is useful to cons consider the following guidelines:

a. Try where appropriate to articulate and present the views of the child
b. Be clear about the consent or lack of consent from parents and why
c. Outline any significant context or brief family history that may be relevant
d. Be clear on what needs to change or be addressed
e. Record/register other services already working with a family
f. ensure you are completing the most updated MARF form on website and you are using the local authority to which the student and or their family reside
g. If possible, relate concerns to the Herefordshire threshold level

8.2 If a child makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions and refrain from victim blaming language.
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.

- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it. When completing reports on My Concern ensure language is objective. You may wish to show on a body map, particular injuries or concerning marks. You may also wish to scan and attach statements, images and your own notes on to the My Concern file
- Sign and date the write-up and pass it on to the DSL or alternatively upload reports on to the My Concern system. Please note that as a "trusted user" on the My Concern system you will be able to access and update any concern which you have instigated.
- Staff will be notified automatically through My Concern via an email when a case/concern has been "picked" by the DSL and when that case has been resolved/filed. If staff are in any doubt that the concern has not been acknowledged, they should contact the DSL. **STAFF SHOULD NOT RELY ON MY CONCERN AS A WAY OF ALERTING THE DSL OF CASES WHERE A CHILD IS IN IMMEDIATE DANGER.**

It is important to note that many children may not feel ready or know how to tell someone that they may be being abused or neglected. This could be due to a certain vulnerability, disability, sexual orientation or another factor. A lack of disclosure should not prevent staff from having a professional curiosity and speaking to a DSL if they still have concerns.

8.3 Children missing in education

A child going missing in education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. A child missing in education is a young person of compulsory education age not registered at a school and not receiving suitable education elsewhere. It does not include post 16 NEET students, students on role with persistent nonattendance or those young people receiving EHE (elective home education.

We will inform the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points. The school will notify the authority after 5 days where there has been no notification/attendance from a student. Where there is an enhanced concern due to the vulnerability of a particular student then the school will alert local police and ask them to undertake a "safe and well" visit. If the school after 20 days wishes to remove a student from its school role it will alert the local authority.

8.4 Early Family Help

It is important to note that as writing of this policy Local authorities including Herefordshire are transitioning from a traditional Early Help model to a Family First Partnership approach which will change the school's role in early support for families. Changes to protocols and assessments will be implemented into policy and practice as and when the new model is fully understood and operational

For students who fall short of thresholds for significant harm- consensual Early Help interventions at stages of 2 and 3 on the needs continuum- may be appropriate. Early help can also be extended to students missing from education or those who have experienced multiple suspensions (at risk of permanent exclusion). Plus students who have a parent/carer in custody or find themselves as a "young carer".

If early help is appropriate and children do not need the support of statutory children's services, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate and if required act a Family First Lead Practitioner. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed

The school maintains and updates its own "Early Help Offer" to which families can be signposted to.

Herefordshire currently offers all stakeholders a support and advice service CHAT contact details tel 01432 260261 where possible referrals to Early Help service can be discussed without referral. Herefordshire also

maintains an Early Help offer of authorised and approved external providers offering services to families and young people

Students themselves can seek advice and self-help strategies through the Herefordshire Safeguarding boards youth portal/hub www.herefordshiresafeguardingboards.org.uk/youth_hub .

Early help assessments should consider how the needs of different family members impact each other, including needs related to education, health, financial and housing stability or specific vulnerabilities. Early Help plans can focus on family function and developing parental capacity. A family first approach should be at the core of any assessment whereby the whole family context in terms of make up, needs, demands and protective factors/ family voice are considered

8.5 Police Referrals

In terms of referring to the police the document bel State clearly that volunteers who now meet the regulated-activity definition require an enhanced DBS check including children's barred-list information.ow is a useful guide as when and when not to contact the police on a range of issues. Staff if in any doubt that a child is open to imminent and significant harm should not hesitate in contacting 999. After consultation with Safeguarding trained staff or Senior leadership a 101 referral (or similar online referral) can be made to West Mercia police (or neighbouring police authorities). Alternatively, the DSL may choose to seek support on whether or not to contact police team through the Integrated Front Door (formerly MASH) team or on local intelligence matters the Ledbury Safer Neighbourhood team

In cases of significant concern about individuals or "contexts" outside of school in terms of possible exploitation, the DSL can refer to the Herefordshire get Safe Team at west Mercia police or raise concerns at the regularly held prevent and disrupt meeting. Unless we had concerns of putting a student at significant further risk of significant harm we would always work with parents and their consent with all matters relating to police action/ responses

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

8.6 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action. If, in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above).

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team. The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and trustees can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

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

8.7 Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

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

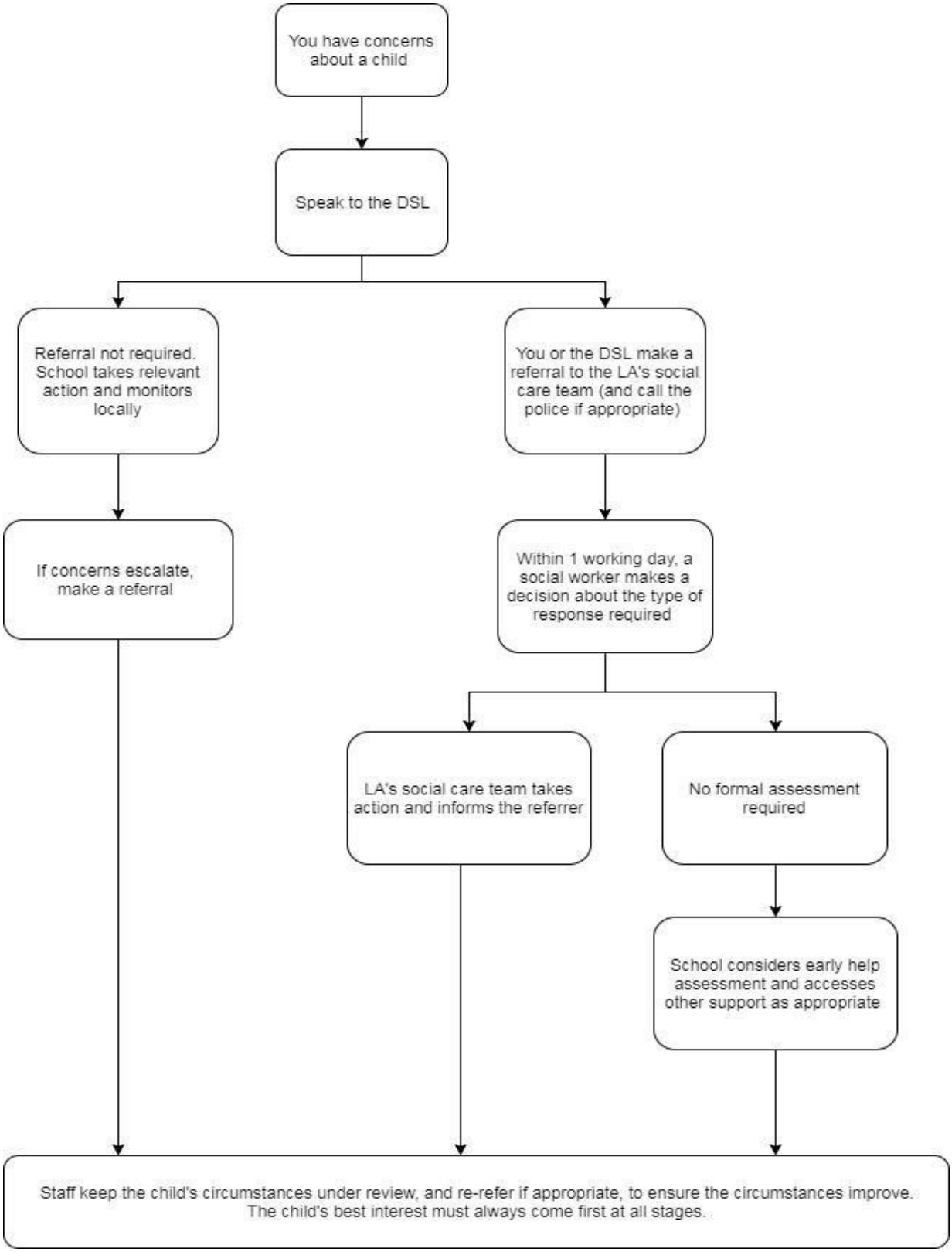
We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force. We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. Staff will be alert to changes in pupils' behaviour.

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

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

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



8.8 Concerns about a staff member, trainee teacher, supply staff ,contractor or volunteer

If you have concerns about any member of staff or volunteer, or an allegation is made about a member of staff or volunteer posing a risk of harm to children, speak directly to the headteacher. If the concerns/allegations are about the headteacher, speak to the chair of trustees.

Low Level concerns whereby a staff member does not believe actual or imminent harm has or is about to occur, however behaviours do cause concern in that they appear to be contrary to the school code of conduct or seem inappropriate in terms of values and attitudes, must also be communicated (see appendix 2) Concerns about professional capacity or teaching quality should not be referred to as or responded to as low level safeguarding concerns.

The headteacher/chair of trustees will then follow the procedures set out in appendix 2, if appropriate. Ultimately all concerns about and allegations about staff behaviour will be forwarded to the Herefordshire LADO who is available on 01432 260800 and/or LADO@herefordshire.gov.uk. Currently the Herefordshire LADO is named on the initial pages of this policy

Any staff member concerned about a colleague and the risks they may or may not present should seek initial guidance in the school's whistleblowing policy but should not hesitate in making their concern known to the headteacher.

Staff must be fully aware that if they believe any of the 4 "harm thresholds" have been met then they DO NOT have a low-level concern and should escalate with the headteacher and DSL accordingly so the LADO can be consulted. Harm thresholds may be met by a staff member outside of the school environment or within their own domestic setting but should still be responded to similarly due to the "transferrable risk" of their actions.

- THRESHOLD 1: **Harm threshold**: a person working with children has behaved in a way that has harmed a child, or may have harmed a child
- THRESHOLD 2: **Criminal threshold**: a person working with children has possibly committed a criminal offence against or related to a child
- THRESHOLD 3**: Risk/Transferable Risk** threshold: a person working with children has behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- THRESHOLD 4: **Suitability threshold**: a person working with children has behaved or may have behaved in a way that indicates they may not be suitable to work with children

8.9 Responding to Female Genital Mutilation (FGM) allegations concerns

Staff members may, following disclosures or community intelligence, be concerned that the criminal offence of FGM has taken place. Alternatively, staff may have seen some of the following concerning behaviours in girls they teach or encounter. (These girls may be vulnerable due to their country of origin, previous FGM concerns in family and a record of non-engagement with health and social service). The following signs could indicate procedures having already taken place or about to:

- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs
- Referring to special occasions ad holidays/ceremonies on becoming a woman
- Unexplained long absences

IF A TEACHER IN COURSE OF THEIR WORK IS TOLD DIRECTLY BY A GIRL UNDER 18 THAT SHE HAS HAD FGM, OR THEY BELIEVE THIS TO BE THE CASE, IT IS A LEGAL DUTY TO PERSONALLY REPORT THIS TO THE POLICE AS SOON AS POSSIBLE. IF THERE IS SUSPECTED RISK/CONCERN REPORT TO THE DSL.

8.10 Child-on-Child Abuse

- We all understand that the definition of child-on-child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control exercised between children and within children's relationships (intimate and non-intimate).

- We all understand that child-on-child abuse requires a contextual safeguarding approach in which professionals understand the potential harms that students may experience outside of the school environment and that we consider fully the safety of our students in their own neighbourhoods, transport systems, central areas, social gatherings and online/ within online communities. Although we are in a lesser position to respond to such harms, we must appreciate their potential ramifications back in school and ensure that information is shared with those in a better position to act.

- We all understand that child-on-child abuse takes on many forms including serious bullying, cyber-bullying, relationship abuse, domestic violence, harassment, child sexual exploitation, youth violence, prejudice-based violence and harmful sexual behaviours.

- We all recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". We also recognise the gendered nature of child-on-child abuse (i.e. that it is more likely that girls will be victims and boys' perpetrators). However, all child-on-child abuse is unacceptable and will be taken seriously. There is in effect a zero-tolerance approach to ignoring such incidents.

- We all understand that just because we may not be aware of multiple and serious cases of child-on-child abuse in our school community that they do not or have not indeed taken place and therefore it is not acceptable to take on only a reactive response. We understand that in our own and national context data shows that it is the most prevalent form of safeguarding concern.

- We all recognise the need not to define incidents in terms of VICTIM and or PERPETRATOR when alleged incidents have been reported or under investigation. Research has shown that those who present harmful behaviour are themselves vulnerable or have experienced similar or differing levels of abuse.

- We all recognise that JMHS is an 11-18 school and that although the schools starting point is that responses to child-on-child abuse should be the same, there may be age-based considerations. For example, based on the legal age of consent and or the legal repercussions for those students aged over 18. We recognise a 2-school cohort year gap between perpetrator and victim as particularly significant.

- We all accept and are mindful of the fact that there are groups within the school that will be more vulnerable to such abuse including those with a Special Educational Need or Disability, Children Looked After (CLA) as well as accepting that statistically girls are more likely to experience harmful sexual behaviours than boys. We also recognise the potential of increased vulnerability of students from the LGBQT+ community.

- We all understand that consent to any sexual activity is legally protected and that it can vary for a person between one sexual activity and another, can be withdrawn at any time and can only be accepted where the person has "capacity" to give it. We are aware that 16 is the legal age of consent and that a child under the age of 13 can never consent to sexual activity.

- We all understand that harmful behaviours exist on a continuum or spectrum in terms of severity. The pastoral team use Hackett's continuum of harmful sexual behaviours which categorises behaviours as normal, inappropriate, problematic, abusive or violent.

Normal	Inappropriate	Problematic	Abusive	Violent
Behaviour is developmentally expected Socially acceptable Consensual, mutual and reciprocal Involves shared decision making	Single instances of inappropriate sexual behaviour Socially acceptable within the peer group Behaviour is in an inappropriate context Generally consensual and reciprocal	Behaviour is problematic and concerning Developmentally unusual or socially unexpected Consent issues unclear May lack reciprocity or equal power May include compulsivity	Victimising intent or outcome Misuse of power Involve coercion or force Intrusive Lack informed consent or victim unable to give consent May include expressive violence	Physically violent Highly intrusive Instrumental violence, physiologically or sexually arousing to th perpetrator Sadism

Although Hackett's relates exclusively to harmful sexualised behaviours it does form a basis for wider decision making in assessing youth violence and other child-on-child abuse by asking the questions:

- Is the behaviour socially acceptable?
- Is it a single event or has it occurred over a period of time?
- Is it considered socially acceptable by peer group?
- Is it problematic or concerning?
- Does it involve overt elements of victimisation or discrimination?
- Does it involve elements of coercion and or pre-planning?
- Does it involve a power imbalance or misuse of power?

It is important to note that Harmful sexual behaviour can occur between 2 or more children of any age and sex. (Staff should be aware that girls are more likely to become victims of sexual violence and harassment.). Failure to adopt a zero tolerance position can lead to a culture of unacceptable behaviour and misogyny. It is also the case that just because children are not reporting such behaviours it does not mean it is not happening. All staff should be challenging and reporting behaviours such as bottom grabbing, breast grabbing, pulling down trousers, flicking bras, upskirting and down blousing.

Sexual harassment refers to any unwanted conduct of asexual nature on and off line that violates a child's dignity or impacts on their mental health and wellbeing. This includes unwanted sexual comments, jokes, remarks, graffiti and sharing of non-consensual self or AI generated images.

In terms of sexual violence section 5 of KCSIE has detailed definitions of the continuum of sexual offences including rape, assault by penetration and sexual assault.

8.11 Responding to child-on-child abuse allegations and incidents

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

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves harmful sexual behaviours plus sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, up-skirting or sexually inappropriate pictures or videos (including sexting) If a pupil makes an allegation of abuse against another pupil:

You must record the allegation and tell the DSL, but do not investigate it. The DSL will

- Contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence

- Put a safety plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This may require adjustments made to student timetables in both the short and long term
- Refer to the children and adolescent mental health services (CAMHS), if appropriate
- Make a decision on, if, when and how parents and carers will be informed. Parents will be informed at the earliest stage possible unless there is a compounding safeguarding reason to not do so
- Signpost, refer and or discuss with students and their families a range of other organizations for whom it may be appropriate for students to work with, for example those support agencies listed on the Herefordshire directory for early help e.g WRMSAC/Purple leaf project

We will minimize the risk of child-on-child abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Being professionally curious about students relationships especially where they are unbalanced in terms of age and other hierarchical dimensions (a significant age difference would generally be more than 2 chronological years)
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent including the mandatory delivery of the RSE curriculum and the concept of online safety
- Ensuring pupils know they can talk to staff confidentially by contacting staff via email, seeing any member of staff in person or coming with an advocate. Ensuring that young people are never made to feel judged or that they are creating a problem
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- Being vigilant with our mobile phone and other online policies
- Regularly seeking the view of students and parents on the topic of child-on-child abuse **O** Reflecting on serious case reviews both within and outside of the school

8.11 Making or sharing of 'nudes' or 'semi-nudes' (including AI generated or digitally altered images)

This advice uses the titled terms to mean the sending or posting of nude or semi-nude images (including AI generated or digitally altered images), videos or live streams by young people under the age of 18 via social media, gaming platforms, chat apps or off line services such as Apple Air drop.

The motivations for taking and sharing such material is not always sexually or criminally motivated and can be created and shared consensually. There can also be levels of coercion even in a consensual relationship. Children can find nude images on line and pass them off or manipulate them so they can appear as an abuse.

Incidents should be defined and approached as either:

- **Aggravated (additional abusive elements) or consensual experimental**
- Adult involved
- Youth only (intent to harm) arising from interpersonal conflict
- Youth only (reckless) images sent without consent – but with no intent to harm
- Either romantically or sexual attention seeking or other

Creating and sharing nudes of under 18year olds is a criminal offence and makes responding to such incidents complex.

Indecent is not defined in legislation but it does not necessarily mean nudity. Images of young people in underwear, part exposing themselves, touching themselves sexually, hurting others sexually and any sexual activity including children or animals are all defined as indecent.

The use of AI to generate deep fake sexualised or nude/semi-nude images of young people – should be responded to in the same way as other real images.

Your responsibilities when responding to an incident

If you are made aware of an incident involving generation of and / or sharing of 'nudes' or 'semi-nudes', including AI generated and digitally altered images, you must report it to the DSL immediately.

You must **not:**

- View, download or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL.
- Delete the imagery or ask the pupil to delete it.
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility).
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to criminalize, blame or shame any young people involved

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

The DSL will liaise with appropriate school staff. And other professionals to ascertain

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

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

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

Informing parents

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through either initial enquiries with, the 101 service. Where staff are concerned that a serious criminal event is imminent or has happened which puts a student at harm of physical abuse they should use the 999 service. The DSL will work with the police to mitigate the unnecessary criminalisation of young people and where appropriate finding a resolution "Outcome 21" where there is no evidence of exploitation, grooming, profit or malicious/persistent behaviour. Where the police attend school to interview a young person in relation to a safeguarding concern and or criminal matter the school will ensure the presence of an appropriate adult to both support the student and observe proceedings in line with PACE Code C guidance. The appropriate adult will be a member of the safeguarding team and where possible a choice of adult will be offered. Where appropriate and possible we will try to ensure that the student has the opportunity to have apparent or guardian present as the appropriate adult.

Curriculum coverage

As part of the school's RSE provision and general PSHE programme, a range of safeguarding issues are discussed and keep safe strategies explored. As this policy is being written the full RSE and PSHE curriculum and model is under review (following statutory guidance). On all issues, pupils are taught in an environment where there are clear guidelines about disclosure and confidentiality. The school will where it feels necessary alert parents and carers to subject matter which they may feel inappropriate. The overall content is outlined to parents as part of the induction process and available on school website.

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9. Notifying parents

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure. Early notification to parents of any concern type should be the "default setting"

Other staff will only talk to parents about any such concerns following consultation with the DSL. If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

10. Pupils with special educational needs, disabilities and other potential vulnerabilities

We recognise that pupils with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Pupils being more prone to peer group isolation than other pupils
- The potential for pupils with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

Although we recognise that being LGBT does not lead to inherent vulnerability, young people with these protected characteristics can be targeted by other students and the school will actively seek to foster a trusted and safe support group or individual for these students and create safe spaces for them to discuss their experiences. Any student perceived as being LGBT but is not necessarily will also be supported individually where appropriate by key members of the pastoral team.

11. Mobile phones and cameras

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

Staff will not take pictures or recordings of pupils on their personal phones or cameras.
We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

The JMHS Policy around mobile phones is that the school is a phone-free site. Students are not permitted to access their phones on the school site at any point from entering until leaving the site. The only exceptions to this are where reasonable adjustments are in place through prior agreement (e.g. monitoring insulin levels) or, at the end of the school day in the designated area of the bus park where logistical arrangements re "pick up" may need to be made. Mobile phone policy should be maintained on school trips and excursions unless a specific plan or risk assessment disqualifies it

All staff communication between student and teacher/staff member should be exclusively conducted on school email system. Before taking a photo of any student using any device, advice should be sought from the DSL team and or School Business Manager with responsibility for GDPR.

Students who break this rule will have their phone confiscated and parents/carers will be informed for collection. The school recognises the risk of unrestricted access to the internet in terms of exposure to possible harmful material, sexual abuse or harassment, the sharing of indecent images, fake news, viral challenges and other risks which are discussed within the school assembly and RSE programme.

Staff should be vigilant of students using unsupervised areas for example toilet blocks to use personal mobile phones

Staff should be aware and be updated on current parliamentary legislation which will prohibit those students under 16 accessing a named set of social media platforms

Staff should be aware that full details about mobile phones and other devices is available in the Online safety policy and Acceptable use of ICT policy.

12. Complaints and concerns about school safeguarding policies

12.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff using the Disciplinary Policy and Procedures.

12.2 Other complaints

Refer to the school's Complaints Procedure in the policy section of the school website.

12.3 Whistleblowing

Refer to the school's Whistleblowing Policy in the policy section of the school website.

The NSPCC also run a free whistleblowing advice phoneline which staff should be aware of and may wish to use in conjunction with processes outlined in the school's whistleblowing policy
"The Whistleblowing Advice Line offers free advice and support to professionals with concerns about how child protection issues are being handled in their own or another organization".

https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowingadvice-line/

13. Record-keeping and information sharing

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

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL. Unless instructed otherwise, all information and narrative regarding safeguarding concerns will be stored on the My Concern platform either as a New concern, Open to intervention and further investigation, filed or archived. The DSL will make the final decision as to when a Concern will be filed (closed to ongoing intervention)

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school. A summary log or dashboard will be updated with key safeguarding metrics including a record of meetings attended, MARFS completed and significant level 4 alerts from external safeguarding partners. At all stages the DSL team should be clearly outlining the rationale for decisions made and key referrals but also when concerns are "filed"

If a child for whom the school has, or has had, safeguarding concerns moves to another school (in year or as part of end of Key Stage 4 transition), the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file (within a 5 day window of admission wherever possible) with a confirm receipt of arrival.
In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child. If the school is also on the "MyConcern system" then documentation will be shared using the secure file transfer feature. Otherwise, the folders will be passed on using secure email systems such as "Anycomms", Egress or in person with a signed receipt of collection form collected. All information received from primary feeder schools is logged on MyConcern on its receipt by our Admissions coordinator who then alerts the DSL and team. It is vital that the admissions team updates the DSL team at the point of any application for admission to school and that the correct questions are asked of families, young people and previous providers when appropriate.

It is important that for **all students,** key information is recorded such as behavioural interventions and sanctions, incidents of unauthorised/authorised non-attendance, plus at least 2 emergency contact details.

14. Training

14.1 All staff

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

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

Staff will be regularly updated and have training refreshed on the systems nationally and locally for Early Help and other Children's services applications and assessments and their potential role in them.

Staff will also be trained in terms of their role and responsibility when it comes to managing and providing guidance in terms of online safeguarding.

Staff will also receive regular safeguarding and child protection updates (for example, through emails, ebulletins and staff meetings) as required, but at least annually.

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

Volunteers will receive appropriate training, if applicable.

14.2 The DSL and deputies

The DSL and deputy will undertake child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). They will also undertake Prevent awareness training.

Various training opportunities are available across the year ranging from whole school briefings on trauma, child-on-child abuse, Safer Recruitments and identification/response to safeguarding incidents. There also exists opportunities for some staff to access Herefordshire CPD courses on the Early Family Help process, CSE assessment, completing graded care profiles and Prevent agenda. There are also opportunities for Safeguarding team members to attend Team Teach “Safer Handling” courses.

14.3 Trustees

All trustees receive appropriate training about safeguarding both on induction and annually, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities. They sign a safeguarding understanding document to acknowledge their training. Training focuses on strategic roles and functions rather than procedures. Both training and Trustee updates should allow the Governing body to support a robust whole school approach to safeguarding which will be a consideration and responsibility of all governing committees.
As the chair of trustees may be required to act as the ‘case manager’ in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

14.4 Recruitment – interview panels

At least one person conducting any interview for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education’s statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures, and the School Safer Recruitment Policy (Appendix 1). The school exercises the right to undertake social media and online screening of candidates once shortlisted and before attending interview

15. Monitoring arrangements

This policy will be reviewed **annually** by the DSL, Deputy DSL, Deputy Headteacher and the Link Trustee for Safeguarding & Child Protection. At every review, it will be approved by the full Board of Trustees.

16. Links with other policies

This policy links to the following policies and procedures:

Online Safety policy
Attendance and Punctuality policy
Behaviour for Learning policy
Code of conduct
Complaints procedure
Disciplinary policy and procedure
Equality Information and Objectives policy
First Aid policy
Health and Safety policy
Relationships and Sex Education policy
Whistleblowing policy
Restraint and Safer handling and search policies

The following appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: Safer Recruitment

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All safeguarding checks on staff working in the school not exempt by their role within a safeguarding partnership agency or being covered by a letter of assurance will be recorded on the school SCR and key hard copy documents on individual personnel files for as long as we are legally or statutorily obliged to do so. We do not perform checks on families of young people and their guests who are on school site to support school sporting and Arts events or attend parents evening. It is the responsibility of the DSL to decide who exactly working in school should be included on the SCR or else be managed as a letter of assurance scheme, or specific risk assessment. All staff looking to host visitors, volunteers and contractors in school should log a request with the visitor portal.

New staff

When appointing new staff, we will:

- Verify their identity
- We will undertake for all newly appointed staff an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below), unless they subscribe to the Update Service in which case we will check this on-line. We will ensure we see the original DBS certificate for all staff and we will not keep a copy of this for longer than
- 6 months on file. With regards to PGCE students, it is the responsibility of the PGCE provider to provide checks – a letter of confirmation of DBS number is provided for each student and proof of id is obtained on starting, which is recorded on the Single Central Record.
- Obtain a separate barred list check if they will start work in regulated activity before the
- DBS certificate is available. If a new teacher has subscribed to the update service we will conduct a check.
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and in line with our records retention schedule
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- Seek and view references from previous employers before interview so as interview questions can reflect circumstances and key events that may need unpacking
- Search online presence via an online search engine for a shortlisted candidate plus notify candidates that this check is forthcoming
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state. Section 128 will only be requested/ undertaken where candidate has senior management responsibilities or is a board member
- We will ask for written information about previous employment history and check that information is not contradictory or incomplete.
- We will seek references on all short-listed candidates, including internal candidates where appropriate, and if possible, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

Regulated activity means a person who will be:

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

Existing staff

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is or promoted to a management leadership role

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

- We believe the individual has engaged in relevant conduct; or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made. This applies also to education provider placements where the school may choose to place a student as part of their curriculum.

Contractors

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

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

We will obtain the DBS check for self-employed contractors. We will not keep copies of such checks for longer than 6 month after the contractors' work is complete. Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances. We will check the identity of all contractors and their staff on arrival at the school.

Users of School premises /JM Sport/ Theatre facility

Where an organisation external to the school is using the school premises for a non-school or college activity involving children, the Governing Body and Leadership team should, seeking guidance if necessary, ensure that appropriate safeguarding and child protection policies are in place. Those organisations booking facilities will be issued and requested to read Gov guidance https://www.gov.uk/government/publications/keeping-children-safe-in-out-of-school-settings-code-ofpractice

Trainee/student teachers

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

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

Volunteers

We will:

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

Trustees

All trustees will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity. The chair of the trustee board will have their DBS check countersigned by the secretary of state.

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

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008). [Section 128 checks are only required for local trustees if they have retained or been delegated any management responsibilities.]
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform. It is the schools' responsibility to make any alternative provider fully aware of any key or specific needs, plus contextual information that may make a student particularly vulnerable and complete a specific risk assessment where appropriate. The school should always be satisfied that the alternative provision does meet the needs of the student undertaking a visit if possible and necessary.

Post 16 adults on work experience at JMHS

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm**.** We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, the frequency of the activity being supervised, the length of placement and whether the work is regulated activity.

Pupils staying with host families

If and when the school make arrangements in the UK for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit to JMHS), we will request enhanced DBS checks with barred list information on those people. Where the school or host schools are organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

Elective Home Education (EHE)

Where a parent or guardian has elected to home educate (as is their right), the school will always be mindful to that young person being less visible to public and children's services and therefore more vulnerable to a range of harms. Wherever possible a meeting with relevant agencies involved would be held to explore any decision to home educate and relevant authorities notified. The school would have increased vigilance where families known or currently open to children's services request EHE

Appendix 2: Allegations made against staff

Where it is alleged that a current member of staff or volunteer has:

- Behaved in a way that has harmed a child, or may have harmed a child (Threshold 1 – Harm)
- Possibly committed a criminal offence against or related to a child (Threshold 2 – Criminal)
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children (Threshold 3 – Risk/Transferable Risk
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children (Threshold 4 – Suitability)

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

Our procedures for dealing with allegations will be applied with common sense and judgement using the school's disciplinary policy and procedures (see page 5 of that policy).

Suspension

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

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the headteacher (or chair of trustees where the headteacher is the subject of the allegation) – the 'case manager' – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police).
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place.
- Advice will be sought from the designated officer, police and/or children's social care services, as appropriate.
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what

information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.

- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate.
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence).
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

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

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

Specific actions following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.
If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.
The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the headteacher, or other appropriate

person in the case of an allegation against the headteacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

Confidentiality

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

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

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

Record-keeping

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

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.

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

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning lessons

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

This will include consideration of (as applicable):

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

Low Level Concerns

Staff may not consider a colleagues' actions or behaviour to meet the four thresholds stated at the section 8.8 of this policy, however, they may still be concerning and indeed part of a bigger picture in terms of that individual staff member. It is the responsibility of all staff to communicate their concerns where they feel that behaviours witnessed do not meet the requirements of the school code of conduct or indeed are perceived as unprofessional. Concerns may include staff humiliating or favouring students, using mobile phones with students, spending significant time one to one with a student, being over familiar with young people or using inappropriate language. Staff should take care that they report such concerns to the headteacher either directly or via the DSL, but should direct concerns not linked to safeguarding, for example professional differences or teaching competency concerns, through their line manager.

Low level concerns will be logged separately to staff files and staff will be informed of the logging and the duration of the record being stored whilst remaining an employee of the school. Only the headteacher who may choose to work with the Safeguarding lead or other key senior staff can make the decision to escalate the concern and notify the LADO or else respond to the concerns internally.