



Child Protection & Safeguarding Policy

Approved by: Full Governing Body

Version 5.1

Date of approval: Autumn 2026

Date of review: Autumn 2027



Child Protection and Safeguarding Policy v5.1 Ratified Autumn 2026

Version history

Version	Details
0.1	Previous ratified version of the policy reviewed by Jamie Maloy, headteacher, and governing body safeguarding governors. Changes made to reflect the Department for Education's September 2021 <i>KCSIE</i> .
1.0	The revised policy was shared with all governors and ratified by the full governing body on 7 December 2021.
1.1	Updated by Jamie Maloy, headteacher, to incorporate changes from <i>Keeping Children Safe in Education 2022</i> . Changes reviewed by Kate Fabian and Jo Winters, safeguarding governors.
2.0	Every governor indicated their approval of the updated policy via email in January 2023.
2.1	Updated by Jamie Maloy, head teacher, to incorporate changes from <i>Keeping Children Safe in Education 2023</i> .
3.0	Version ratified by Full Governing body in our September 2023 meeting
3.1	Updated by Jamie Maloy, head teacher, to incorporate changes from KCSIE 2024 with input from Elizabeth Youard as Safeguarding Lead Governor.
3.2	Policy ratified by the Governing Board on 23 rd September 2024.
3.3	Updated by Jamie Maloy, head teacher, to incorporate changes from <i>Keeping Children Safe in Education 2025</i> .
4.0	Policy ratified by the Governing Board on 17 th September 2025. Amendment reflects agreement that the school should have up to two safeguarding governors.
4.1	Policy updated for clarification that school contacts one parent/carer in a family after a disclosure, and ratified by the Governing body.
5.0	Updated by Jamie Maloy, head teacher, to incorporate changes from <i>Keeping Children Safe in Education 2026</i> .
5.1	Policy ratified by the Governing Board on 23 rd September 2026.



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Important contacts

Role/organisation	Name	Contact details
Designated safeguarding lead (DSL)	Jamie Maloy	020 8567 1432 head@grange.ealing.sch.uk
Deputy DSLs	Sarah Mears Yola Campbell	smears@grange.ealing.sch.uk ycampbell@grange.ealing.sch.uk
Office Manager (OM)	Karina Oliveira	koliveira@grange.ealing.sch.uk
Local authority designated officer (LADO)	Sharon Ackbersingh	asv@ealing.gov.uk 020 8825 8930
Co -chairs of governors	Tom Clarkson Elizabeth Youard	chair-governor@grange.ealing.sch.uk
Safeguarding Governor	Elizabeth Youard	eyouard@grange.ealing.sch.uk
Channel helpline		020 7340 7264



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1. Aims

The school aims to ensure that

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

2. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE) statutory guidance [Keeping Children Safe in Education \(2026\)](#) and [Working Together to Safeguard Children \(2024\)](#), and the [Maintained schools governance guide](#). We comply with this guidance and the arrangements agreed and published by our three local safeguarding partners.

This policy is also based on the following legislation

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the *Female Genital Mutilation Act 2003*, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#) (as amended by the Protection of Freedoms Act 2012 and The Crime and Policing Act 2026), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what *regulated activity* is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the *Counter-Terrorism and Security Act 2015* with respect to protecting people from the risk of radicalisation and extremism
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the



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rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)

- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, sex, sexual orientation, pregnancy and maternity, marriage or civil partnership, gender reassignment and race, religion or belief). This means our governors and head teacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the *2018 Childcare Disqualification Regulations*) and [Childcare Act 2006](#), which set out who is disqualified from working with children

This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage \(EYFS\)](#).

School Attendance (Pupil Registration) (England) Regulations 2024

3. Definitions

Safeguarding and promoting the welfare of child	• Providing help and support to meet the needs of children as soon as problems emerge • Protecting children from maltreatment whether that is within or outside the home, including online • Preventing impairment of children's mental and physical health or development • Ensuring that children grow up in circumstances with the provision of safe and effective care • Taking action to enable all children to have the best outcomes
Child protection	Part of the definition above and refers to activities undertaken to prevent children suffering, or being likely to



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	suffer, significant harm. This includes harm that occurs inside or outside the home, including online.
Abuse	A form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. "Appendix A" explains the different types of abuse.
Neglect	A form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. "Appendix A" defines neglect in more detail.
Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery)	Where children share nude or semi-nude images, videos, computer-generated imagery or live streams. This also includes images that are digitally altered or wholly AI-generated (sometimes called 'deepfakes' or 'deep nudes') that otherwise appear to be a photograph or video. The sharing of nude or semi-nude images requires a safeguarding response whether they are consensual or non-consensual.
Children	Includes everyone under the age 18.
Victim	A person harmed, injured or killed as a result of a crime, incident/accident or other event. A widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.
Alleged perpetrator(s) and perpetrator(s)	A person who carries out (or is said to have carried out) a harmful, illegal or immoral act. Widely used and recognised terms, however, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.
Safeguarding partners	The following three <i>safeguarding partners</i> are identified in <i>Keeping Children Safe in Education</i> (and defined in the <i>Children Act 2004</i> , as amended by chapter 2 of the <i>Children and Social Work Act 2017</i>). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs



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	• The local authority (LA) – Ealing Council • NHS Ealing Integrated Care Board The chief officer of police for a police area in the LA area – Chief Superintendent West Area BCU Commander
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4. Equality statement

Some children have an increased risk of abuse, both online and offline, 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 or health conditions (see "section 9")
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- 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 (see "appendix C")
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation (see "appendix C")
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs (see "section 7.6")
- Are looked after or previously looked after (see "section 11")
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from school to be home educated

5. Roles and responsibilities

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



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

- Behaviour policy
- Pastoral support system
- Planned programme of relationships and health education (RHE), which is inclusive and delivered regularly, tackling issues such as
 - Healthy and respectful relationships
 - Boundaries and consent
 - Stereotyping, prejudice and equality
 - Body confidence and self-esteem
 - How to recognise an abusive relationship (including coercive and controlling behaviour)
 - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
 - What constitutes sexual harassment and sexual violence and why they're always unacceptable

5.1 All staff including supply staff, volunteers and contractors

All staff will read, understand and act in accordance with part 1 of the DfE's statutory safeguarding guidance, [*Keeping Children Safe in Education*](#), and review this guidance at least annually.

All staff will sign a declaration at the beginning of each academic year to say that they have reviewed, understood and will implement the guidance.

All staff will reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (eg sites they need to visit or who they'll be interacting with online).

All staff will provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns.

All staff will be aware of

- Our systems which support safeguarding, including this *Child protection and safeguarding policy*, the *Staff code of conduct*, the role and identity of the designated



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safeguarding lead (DSL) and deputies, the *Behaviour policy*, our *Esafety policy* (which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring), and the safeguarding response to children who go missing from education

- Be aware of the school's unauthorised absence procedures and children missing education procedures
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority (LA) children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- The process for community-based Family Help assessments
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect, exploitation and modern slavery, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)

The safeguarding issues that often overlap and can put children at risk of harm, including:

- Drug taking and/or alcohol misuse
- Unexplainable and/or persistent absences from education
- Serious violence, criminal exploitation (including that linked to county lines), radicalisation
- Consensual and non-consensual making or sharing of nudes or semi-nudes
 - New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe



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- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that mental health can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children
- The potential vulnerabilities of children who are questioning their gender
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

“Section 16” and “appendix C” of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (SDL) and deputy DSLs

The DSL is a member of the senior leadership team. Our DSL is Jamie Maloy, Headteacher. The DSL takes lead responsibility for child protection and wider safeguarding. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. The DSL will also be contactable by email outside of school hours.

When the DSL is absent, the deputy DSLs – Sarah Mears (deputy head teacher) and Yola Campbell (safeguarding officer) – will act as cover. All have access to our shared mailbox and full access to CPOMS.

If the DSL and deputies are not available, year group leaders will be released from class and act up to these positions. During out-of-hours/our-of-term activities, the Office Manager will act as cover. Full access to systems and mailboxes will be given to these persons as and when needed.

The DSL and deputy DSLs will be given the time, funding, training, resources and support to

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (LA children’s social care, *Channel programme*, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly



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- Have a good understanding of harmful sexual behaviour
- **Make sure that staff have appropriate Prevent training and induction**
- Have a good understanding of the filtering and monitoring systems and processes in place at our school

The DSL or DDSs will also

- Liaise with LA case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and LA children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Where the school places a pupil with an alternative provision provider, to continue to be responsible for the safeguarding of that pupil and be satisfied that the placement meets the pupil's needs
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- Ensure that child protection files are kept up to date
- Where children leave the school, ensure their child protection file is transferred to the new school

The full responsibilities of the DSL and deputies are set out in their job descriptions.

5.3 The governing body

The governing body will facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

The governing body will ensure that all staff who work directly with children read **at least part 1** of Keeping Safe in Education (KCSIE) and those staff who do not work directly with children read **part 1** of KCSIE

The governing body will evaluate and approve this policy at each review, ensure it complies with the law and hold the head teacher to account for its implementation.

The governing body will be aware of its obligations under the *Human Rights Act 1998*, the *Equality Act 2010* (including the *Public Sector Equality Duty*), and our school's local multi-agency safeguarding arrangements.



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The governing body will appoint up to two safeguarding governors to monitor the effectiveness of this policy in conjunction with the full governing body. The DSL will not be a safeguarding governor.

The governing body will ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners.

The governing body will ensure the school has a policy in respect of the use of restrictive interventions, including the use of reasonable force and which reflects that the adoption of a 'no contact' policy can leave staff unable to fully support and protect pupils.

The governing body will ensure the school has appropriate cyber security systems in place. The governing body will ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:

- Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
- Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

The governing body will make sure

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). "Appendix B" of this policy covers this procedure
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll)
 - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
 - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate



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- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of governors will act as the case manager in the event that an allegation of abuse is made against the head teacher, where appropriate (see "appendix B").

All governors will read [*Keeping Children Safe in Education*](#) in its entirety.

"Section 16" of this policy has information on how governors are supported to fulfil their role.

5.4 The head teacher

The head teacher 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, and understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents when their child joins the school and via the school website
- Ensuring that the DSL and deputies have 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, including Online Safety, and updating the content of the training regularly
- Acting as the *case manager* in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see "appendix B")
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the safeguarding team on this
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the EYFS is assigned a key person
- Overseeing the safe use of technology, mobile phones and cameras in the setting

5.5 Virtual school heads

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

They should also identify and engage with key professionals, eg DSLs, SENCOs, social workers, mental health leads and others.



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6. Confidentiality

All safeguarding information will be stored securely on our online, cloud based system, CPOMS. Please see our *Data protection policy* for information about privacy and storage.

When sharing information, we note

- 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 school will act without delay to share information within the school and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required, sharing with the minimum number of people to effectively provide support.
- The *Data Protection Act (DPA) 2018* and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share *special category personal data*, the DPA 2018 contains *safeguarding of children and individuals at risk* as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment
 - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
 - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
 - The DSL should consider that
 - Parents or carers should normally be informed (unless this would put the victim at greater risk)
 - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to LA children's social care
 - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10 the starting principle of referring to the policy remains
- Regarding anonymity, all staff will



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- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's [information sharing advice for safeguarding practitioners](#) includes seven *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)
- Where a child leaves the school the DSL should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving
- Confidentiality is also addressed in this policy with respect to record-keeping in "section 15", and allegations of abuse against staff in "appendix B"

7. Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Has a mental health need
- Is a young carer
- Is bereaved
- Is showing early signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited into terrorism
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online



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- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion and in alternative provision or a pupil referral unit

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue. Please note, in this and subsequent sections, you should take the references to the DSL to mean *the DSL (or deputy DSL)*.

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

You must **immediately inform the DSL** if you feel a child is suffering or likely to suffer harm, or in immediate danger. Do this through a phone call, email or face to face. In addition to recording the incident on CPOMS or an *Orange form* (see "section 7.2"). The DSL will then make a referral to children's social care and/or the police.

Alternatively, you can 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.**

Ealing Children's Social Care Team – 020 8825 8000

Police – 999

Tell the DSL as soon as possible if you make a referral directly.

Follow the *Reporting Action* in "section 7.2".

7.2 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
- 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



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- 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
- Bear in mind that some children may
 - Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
 - Not recognise their experiences as harmful
 - Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers
- Follow the *Reporting Action* in "section 7.2.1"

None of this should stop you from having a *professional curiosity* and speaking to the DSL if you have concerns about a child.

7.2.1 Reporting Action

All staff

- i. Record the concern on CPOMS
 - a. Include what the child said
 - b. Record any injury on the body map
- ii. If electronic systems are not working or the child is in immediate danger, the duty of all staff is to inform a member of the safeguarding team verbally before the child goes home

SMSA, visitor, supply staff or parent

- i. Tell the DSL
- ii. Record the concern on the *Orange Child Protection/Child Concern Form* (see "appendix E")
- iii. Record any injury on a body map (see "appendix D: Grange body map")

7.3 If you discover that FGM has taken place or pupil is at risk of FGM

Keeping Children Safe in Education explains that FGM comprises *all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs.*

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

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in "appendix C" of this policy.



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Any teacher who either

- Is informed by a girl under 18 that an act of FGM has been carried out on her, or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

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

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

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

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

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

Local Procedure – DSL will contact ECIRS and/or the police.

Ealing Children's Integrated Response Service (ECIRS) referrals:

020 8825 8000

Police non-emergency number: 101

Please refer to "appendix C" for further advice relating to FGM and other specific safeguarding issues including

- Children missing in education
- Child criminal exploitation
- Child sexual exploitation
- Domestic abuse
- Homelessness
- Honour based abuse
- Preventing radicalisation



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7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

“Figure 1” below illustrates the procedure to follow if you have any concerns about a child’s welfare.

Where possible, log the concern on CPOMS/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 take advice from local authority children’s social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children’s social care directly, if appropriate (see “7.4.2 Referral” below). Log all reports onto CPOMS and share any action taken with the DSL as soon as possible.

7.4.1 Early help assessment (EHAP)

If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

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.

For an early help assessment, DSL will contact the Family Information Service

Tel: 020 8825 5588

Email: EHAP@ealing.gov.uk

7.4.2 Referral

If it is appropriate to refer the case to local authority children’s social care and/or the police, the DSL will make the referral. This decision is made by the Safeguarding team on a case-by-case basis. One specific example of this is physical chastisement by a parent/carers, where the school may not always refer in the first instance, instead offering support and advice as appropriate. If unsure, the Safeguarding team will seek advice from ECIRS advice line.

If you make a referral directly (see “section 7.1”), you must tell the DSL and log a report on CPOMS as soon as possible.



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The local authority will make a decision within one working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves. See

https://www.londonsafeguardingchildrenprocedures.co.uk/profess_conflict_res.html

Referrals can be made to **Ealing Children's Integrated Response Service (ECIRS)** by telephone: 020 8825 8000. Or in writing to one of these

- Email: ecirs@ealing.gov.uk (link sends e-mail)
- Post: Ealing Children's Integrated Response Service; Perceval House; 2nd Floor blue area; 14-16 Uxbridge Road, Ealing, W5 2HL
- Fax: 020 8825 9127

All urgent referrals should be initiated by phone 020 8825 8000 and followed up by submitting the referral form within 24 hours.

7.5 If you have concerns about extremism

All school staff have a responsibility to protect children from radicalisation and extremism (see "appendix C" for more information). If a child is not suffering or likely to suffer from harm, or in immediate danger, log the concern on CPOMS or speak to the DSL following our reporting procedures.

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 "7.4.2 Referral" above). Inform the DSL or deputy, and log the information on CPOMS, as soon as practically possible after the referral.

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

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

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

- Think someone is in immediate danger



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

7.6 If you have a mental health concern

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Mental health problems can also, in some cases, develop into safeguarding concerns (for example, self-harm).

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise, including:

- Significant changes in behaviour,
- Ongoing difficulty sleeping
- Withdrawing from social situations
- Not wanting to do things they usually like
- Physical signs of self-harm or neglecting themselves

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in “section 7.4”.

If you have a mental health concern that is **not** also a safeguarding concern, log the concern on CPOMS or speak to the DSL.

7.6.1 Mental health support in school

The DSL and other key staff have undertaken training in mental health for children, and many whole school strategies exist: mindfulness, PSHE curriculum, pastoral support in class.

Grange Space provides a self-referral service for children to discuss concerns with a staff member.

School employs a safeguarding officer who works with identified children one-to-one and also runs nurture groups and breakfast club provision.

The safeguarding team meet weekly to discuss all vulnerable children, and signpost/provide the support above. If appropriate, the child will also be referred to Ealing Child and Adolescent Mental Health Support (CAMHS)

Tel: 020 8354 8160

Fax: 020 8354 8391

Ealing CAMHS, 1 Armstrong Way, Southall, UB2 4SA



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7.7 Support for staff

The abuse of children can create strong emotions in professionals, especially if they know the child well. Such feelings are natural and can affect staff personally. Staff may also have the burden of continuing daily contact with the child, and in some cases the parents. Support in the form of opportunity for staff to discuss their feelings and the effect of this work on their personal life can come from

- Colleagues, the DSL or a deputy
- The Workplace Options Employee Assistance Program confidential telephone counselling service, available to school staff 24 hours a day, 7 days a week. A flyer with their up to date contact number is on the notice board in the staff room
- The local authority's designated officer (LADO) is available for discussion or organisation of appropriate support by phone: 020 8825 8930 or email: asv@ealing.gov.uk. Further details are available at <https://www.egfl.org.uk/services-children/safeguarding/child-protection/contacts-advice-and-support>

7.7.1 Procedure for supporting staff if you have concerns about a child's welfare

"Figure 1" below sets out the 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. **If the DSL is unavailable, this should not delay action.** See "section 7.4" for what to do.

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

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

The head teacher/chair of governors will then follow the procedures set out in the school's [*Procedure for responding to allegations of abuse made against staff*](#), if appropriate.

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

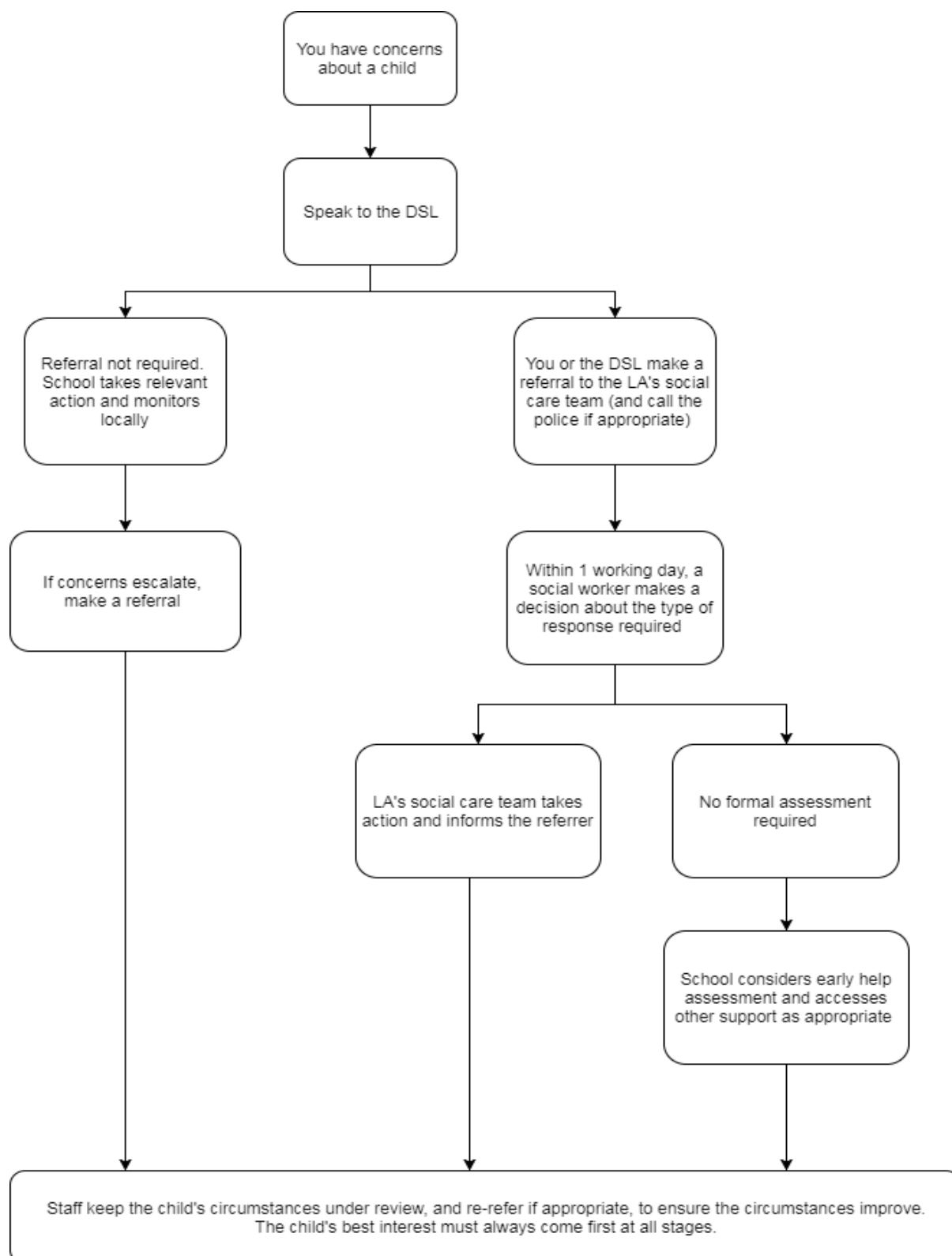
Please refer to "appendix B" for further information on what an allegation of abuse made against staff might entail.

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.



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Figure 1 Procedure if you have concerns about a child's welfare





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7.9 Allegations of abuse made against other pupils (child-on-child abuse)

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as *banter*, *just having a laugh* or *part of growing up*, as this can lead to a culture of unacceptable behaviours, misogyny/misandry and an unsafe environment for pupils.

For some (but not all) forms of child-on-child abuse 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.

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

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes and intimate images, including where generated by AI), which may include or be driven by misogyny/misandry

If a pupil makes an allegation of abuse against another pupil

- You must record the allegation on CPOMs and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)

The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Any staff member who identifies or suspects a case of child-on-child abuse should



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- Deal with a situation of peer abuse immediately and sensitively
- Gather the facts from the child making the disclosure, but do not investigate
- Report the concern via CPOMs (or *Orange form*) as you would for any other safeguarding concern

The DSL will then decide on the appropriate course of action.

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

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents (see “appendix C”).

To achieve this, we will

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils know they can talk to staff confidentially, in class or via Grange Space
- Ensure pupils are able to easily and confidentially report abuse using our reporting systems (described in “section 7.2” above)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Recognise the intersection of misogyny/misandry and harmful sexual behaviour. We will actively identify, challenge and address how misogynistic/misandrist attitudes contribute to the normalisation of inappropriate behaviour and increases the risk of leading to child-on-child abuse, including sexual harassment and sexual violence, within our school environment
- Be alert to the prevalence of harmful online material and extreme misogynistic/misandrist ideologies, including misogynistic influencers, and recognise the impact this content could have on shaping pupils’ attitudes
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and



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any witnesses are not bullied or harassed

- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment

Ensure staff are trained to understand

- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of *it could happen here*
- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child's behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity, first language and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
- That exposure to misogynistic/misandrist content online can indicate a safeguarding concern and requires early discussion with the DSL

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, eg by the police.

The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this



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- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

7.10 Making or Sharing of nudes and semi-nudes (*Sexting*)

7.10.1 Your responsibilities when responding to an incident

All incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual, require a safeguarding response. If you are made aware of an incident involving the consensual or non-consensual making or sharing of nude or semi-nudes, including where generated by AI, you must report it to the DSL immediately.

You must **not**

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

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

7.10.2 Initial review meeting

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

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



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- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

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

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

7.10.3 Further review by the DSL

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

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

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

7.10.4 Informing parents/carers

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

7.10.5 Referring to the police

If it is necessary to refer an incident to the police, this will be done through calling 101 or contacting the Local Safer Neighbourhoods Team.



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7.10.6 Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them will be recorded on CPOMS. The record-keeping arrangements set out in “section 15” of this policy also apply to recording incidents of sexting.

7.10.7 Curriculum coverage

Pupils are taught about the issues surrounding sexting as part of our PSHE, relationships and health education (RHE) and computing programmes, at an age appropriate level. Please refer to our *e-safety policy*, *PSHE policy* and *RHE policy* for more information. Teaching covers the following in relation to sexting

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive
- Issues of legality
- The risk of damage to people’s feelings and reputation

Pupils also learn the strategies and skills needed to manage

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

8. Notifying parents/carers

Where appropriate, we will discuss any concerns about a child with the child’s parents/carers. School will contact one parent/carer directly, with the expectation that information will be conveyed between other parents/carers themselves. The DSL will normally do this in the event of a suspicion or disclosure.

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

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



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

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

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, eg moving them out of classes with the victim, and the reason(s) behind any decision(s)

It is necessary to strike a balance between respecting the parents and ensuring children are protected. Childcare legislation stresses that the child's welfare is paramount so parents/carers may have to be placed second in order to protect children who may be abused.

Staff need to be aware that it is important

- Not to make assumptions or express opinions to parents/carers
- Not to assume that parents/carers are *not the sort of person* who would abuse
- To gather all related information
- To keep in mind that the investigation is not a criminal inquiry but an attempt to find out what has happened
- **That the school is not required to disclose any child protection information to parents/carers**
- In cases of physical or sexual abuse to contact children's social care before parents/carers are told of the concern
- To tell parents/carers that government guidelines direct schools to refer concerns to children's social care and that the school has no discretion in the matter

9. Pupils with special educational needs and disabilities

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

Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration



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- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges risks they do not understand that what is happening to them is abuse
- The need for intimate care or that these children are isolated from others
- That these children are more likely to be dependent on adults for care
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENDCO.

Grange has several mechanisms in place to support and encourage SEND as well as other vulnerable pupils, including

- The school's listening post, known as Grange Space which is open for all children to express their worries or concerns in a more sensitive one-to-one context
- The nurture groups, small groups and one-to-one work led by our safeguarding officer to support vulnerable pupils, SEND or those with additional needs
- The breakfast club, which offers a nurturing environment to vulnerable children, including those with SEND or additional needs, who may benefit from the opportunity to socialise with their peers before the start of the school day
- Individual risk assessments which are created collaboratively with parents to ensure safety measures are in place for a child who could be vulnerable due to their SEND or additional needs

Weekly safeguarding meetings allow opportunities to follow up actions for SEND pupils for whom safeguarding concerns have been raised.10. Pupils with a social worker

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

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

Where we are aware that a pupil has a social worker, the DSL will always consider this fact



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to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about

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

11. Looked-after and previously looked-after children

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

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

We have appointed a designated teacher, Sabina Sidhu (deputy head, inclusion) who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

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

As part of their role, the designated teacher will

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

12. Pupils who are lesbian, gay, bisexual or gender questioning

The school recognises that a child being lesbian, gay, or bisexual is not in itself a risk factor for harm. However, pupils who are (or who are perceived by other children to be) lesbian, gay, or bisexual can sometimes be vulnerable to discriminatory bullying. See our behaviour policy for more detail on how we prevent bullying based on sexuality.

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

12.1 Pupils who are questioning their gender

We are aware of the potential vulnerabilities of children who are questioning their gender,



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including the possibility of complex mental health and psychosocial needs, such as relating to relationships with family, peers or their broader social environment.

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

12.2 Involving parents/carers in cases of pupils questioning their gender

Where a child who is questioning their gender asks for support from the school, we will engage parents/carers as a matter of priority.

However, in the rare circumstances where involving parents/carers might put a pupil at greater risk than not involving them, the DSL will determine a course of action needed to safeguard the child before contacting parents/carers or any decisions are taken.

Where a child confides in a member of staff about their feelings but does not ask the school to make changes to how they are treated, the school will only break any confidence if there is a related safeguarding risk.

12.3 Considering requests for support with social transition

The school will not initiate any action regarding social transition. However, when a pupil or their parent/carer requests that the school makes changes or puts support in place to facilitate the pupil presenting as the opposite biological sex ("social transition"), we will work together with parents/carers to determine what is in the best interests of the child and other children.

Members of staff will not adopt any changes relating to social transition unless a decision has been made by the school and a child's parents/carers have been involved (as set out in [Keeping Children Safe in Education](#) (KCSIE)).

In making decisions about supporting social transition, the school will ensure compliance with its obligations in respect of safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by the school's evaluation of the welfare and best interests of the child and other children. The schools will make decisions in line with the following principles:

- The school has statutory duties to safeguard and promote the welfare of all children: the first step when considering a child's request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child's wishes
- Parents and carers should be actively involved and their views treated with importance: (except in the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them) where a child who is questioning their gender asks for support from the school parents/carers will be engaged as a matter of priority and their views will carry great weight and be properly considered



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- Accommodating social transition is an active intervention so the school will take a very careful approach: social transition is an active intervention that may have significant effects on the child in terms of their psychological functioning and longer-term outcomes
- The school will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition

The school will ensure that the decision-making process is documented and records are kept.

The circumstances or needs of a child may change over time, and the school may need to review its original decision and will involve the DSL in doing so.

12.4 Rules on single-sex spaces

Pupils are not allowed into toilets designated for the opposite biological sex, with no exceptions.

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

13. Pupils with medical conditions

An incident relating to the management of a child's medical condition (including allergies) does not itself warrant a referral to local safeguarding partners.

A safeguarding referral will be made where an incident highlights concern that the child might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family because of their medical condition. For example, information about the child's medical condition might be withheld from the school, or the child may be repeatedly sent to school without essential medication, putting them at risk.

14. Young Carers

The school recognises that caring responsibilities can impact on a child's attendance, attainment, behaviour and wellbeing, and early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health service.

15. Online safety and the use of mobile technology

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



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To address this, our school aims to

- Have robust processes in place (including filtering and monitoring systems) to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as *mobile phones*)
- Set clear guidelines for the use of mobile phones for the whole school community, including the expectation that our school is a mobile phone-free environment by default
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

15.1 The four key categories of risk

Our approach to online safety is based on addressing four categories of risk.

Content	being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories
Contact	being subjected to harmful online interaction with other users or generative AI applications that simulate this, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
Conduct	online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images including those generated using AI and online bullying.
Commerce	Risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

15.2 Meeting our aims and addressing the four categories of risk

To meet our aims and address the risks above we will

- Educate pupils about online safety as part of our curriculum, for example
 - The safe use of social media, the internet and technology



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- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation and the expectations, roles and responsibilities around filtering and monitoring; all staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings; we will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that
 - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
 - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones (see *Mobile phone policy* and *Behaviour policy*)
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the four key categories of risk (described above) from the school's IT systems
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly



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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. In addition, the school has the following child protection protocols in relation to the use of mobile technology in the early years settings

- Parents and carers are asked to switch off mobile phones if they are coming into the early years setting and leave the setting if they need to use their mobile
- Parents are prohibited from taking any photographs of children in the early years setting; exceptions would be for events such as: class assembly, Christmas concert or sports day when parents will be briefed on permissible use
- At all school events, including those within the EYFS setting, parents will be asked (by a member of the senior leadership team) to not post any pictures taken anywhere within the school, or at a school related event, on social media of any kind
- Staff seek parental permission to publish photographs of the children on our Tapestry system, which must be linked to teaching the curriculum, and staff use school equipment only for this purpose
- Staff must use mobile phones during breaks in the staff room and not whilst children are present unless in an emergency
- Only school cameras/devices should be used for all recording/photographing purposes both in and out of school; these images should only be printed out at school and staff should not under any circumstances take home photos or images of children

All volunteers, visitors, governors and contractors are expected to follow the policy in the same manner staff are required to.

If a mobile phone is brought to school by a pupil, they must be given to the school office/class teacher on arrival and collected at the end of the day.

For further guidelines relating to the use of mobile technology and e-safety across the school, please refer to the school's *Use of mobile phones and smart devices in school policy* and *the E-safety policy*.

15.3 Artificial Intelligence (AI)

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

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



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Grange will treat any use of AI to access harmful content or bully pupils in line with this policy and our Behaviour Policy.

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

16. Other school procedures

16.1 Non-collection of children

If a child is not collected at the end of the session/day, we will

- After normal end of school day collection, non-collected students are sent to the welfare office
- A welfare officer phones the student's parent/carer to ask the reason for lateness and arrival time
- Children are kept at the welfare office until a parent/carer can be contacted and arrives for collection
- After 15 minutes (and if there are no safeguarding concerns), children are taken to Fit For Sport wraparound care, and parents are charged
- After 5 pm, if a parent/carer or emergency contact cannot be contacted, the Ealing social care team will be contacted to collect the student

The school will contact parents/carers who persistently collect their children late and advise them to collect their children on time.

Where there are on-going concerns with persistent non-collection, the school will organise a meeting with parents to identify the issue and discuss strategies/external support. When strategies have not been followed or external support has not been sought and the persistent non-collection occurs, this will be identified as a safeguarding concern.

16.2 Collection of children by a non-approved person

Children can only be collected by adults for whom parents/carers have given prior agreement. Any other adult will not be allowed to take the child until approval has been given by the parent/carer.

16.3 Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will

- Immediately contact the police (999) and the child's parents/carers, giving as much information as possible



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- Ask all available staff to begin systematically searching the school grounds and surrounding areas taking mobile phones with them for communication
- Ensure the security of the site, by making sure all access gates are locked

For children missing education (CME), please see “appendix C” and our *Attendance policy*

17. Complaints and concerns about school safeguarding policies

17.1 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* (see “appendix B”).

17.2 Other complaints

For all other complaints, for example, those relating to site security, please follow the school’s *Complaints policy*.

17.3 Whistle-blowing

If you have concerns regarding the way the school safeguards pupils, including poor or unsafe practice, or potential failures, please refer to the school’s *Whistleblowing policy* for information about how to report your concerns.

18. Record-keeping

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

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded on CPOMS. This should include instances where referrals were or were not made to another agency such as local authority children’s social care or the Prevent programme, etc. We encourage everyone to log any concerns, however small they are, and however insignificant they may seem. However, if you are in any doubt about whether to record something, discuss it with the DSL.

Non-confidential records will be easily accessible and available on CPOMS to all users. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. On CPOMS, members of the safeguarding team have full access to records, and year group leaders have access to the children in their current year group. Any requests for information must be made directly to the DSL.

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

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and



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securely, and separately from the main pupil file. To allow the new school/college to have support in place when the child arrives, this should be within five days for an in-year transfer, or within the first five days of the start of a new term. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

All safeguarding records at Grange are kept securely online, using our CPOMS system. These are kept archived for seven years after a) the child moves school or b) the child leaves school at the end of year 6.

In addition, Grange's *Procedure for dealing with allegations of abuse made against staff* sets out our policy on record-keeping with respect to allegations of abuse made against staff.

19. Training

19.1 All staff

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

This training will

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the three safeguarding partners
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring

- Have regard to the *Teachers' Standards* to support the expectation that all teachers
 - Manage behaviour effectively to ensure a good and safe environment
 - Have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas.

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

Supply teachers will receive a safeguarding pack in line with statutory requirements.



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Other visitors, including volunteers, PTA members, parents and contractors, will be asked to read and agree a safeguarding notice before signing into the school, so that they are aware of how to report a concern and to whom.

19.2 The DSL and deputies

The DSL and deputies will undertake child protection and safeguarding training at least every two 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.

New updates and reminders will be shared with year group leaders and the SBM regularly, as these are may have to *act up* in line with contingency planning. These staff will also be offered training courses in addition to the yearly safeguarding training for all staff.

19.3 Governors

All governors are required to undertake annual safeguarding training as set out from the school, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge. Governors also receive training so they can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding.

Ealing's governor services also provide training for new governors and for safeguarding link governors to support governors in relation to their safeguarding duties.

Governors are required to undertake mandatory Prevent training every two years.

At least one governor must be safer recruitment trained.

In addition, the school's safeguarding team supports safeguarding governors via termly meetings and updating governors on topics and issues which are most current.

As the chair of governors 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.

It is important that the Governing Body is aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

19.4 Recruitment: interview panels

At least one person conducting any interview for a post at the school will have undertaken



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safer recruitment training. This will cover, as a minimum, the contents of the DfE's statutory guidance, *Keeping Children Safe in Education*, and will be in line with local safeguarding procedures.

19.5 Staff who have contact with pupils and families

All staff who have contact with children and families will have support, coaching and training, to promote the interests of children and allow for confidential discussions of sensitive issues. This will occur informally in teams, and more formally with line managers.

20. Safer recruitment: visitors

20.1 The importance of safer recruitment

Grange recognises that safer recruitment practices are a key component to the school's safeguarding commitment. The schools *Recruitment and selection policy* outlines in detail the measures the school takes to ensure the whole staff recruitment process meets safeguarding requirements, from writing the job advertisement, undertaking criminal record checks, interviewers completing safer recruitment training, and thorough record keeping via a *single central record*. We acknowledge updates to the safer recruitment of new staff and volunteers, and the Crime and Policing Bill Act 2026. Please see the school's Recruitment and selection policy for more information.

Further detail can be seen in the *recruitment and selection policy*.

20.2 Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we rely on the local authority to have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

20.3 Checking the identify and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s) in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign in using our InVentry system and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists, school improvement officers and extended schools clubs leads, will be asked to show photo ID and

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID, or



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- The organisation sending the professional, such as the LA or educational psychology service, will have provided prior written confirmation that an enhanced DBS check with barred list information has been carried out.

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

21. Monitoring arrangements

This policy will be reviewed **annually** by the DSL. At every review, it will be approved by the full governing body.

Safeguarding governors will also carry out termly safeguarding monitoring activities which include termly meetings with the DSL and may include monitoring visits to school, focusing on topical safeguarding issues.

22. Links with other policies

This policy links with the following policies and procedures

- *Procedure for managing allegations of abuse made against staff*
- *Anti-radicalisation*
- *Behaviour management (inc. Restrictive Interventions policy)*
- *Children with health needs who cannot attend school*
- *Staff code of conduct*
- *Governor code of conduct*
- *Complaints*
- *Health and safety*
- *Attendance*
- *E-safety*
- *Use of mobile phones and smart devices in school*
- *Equality*
- *Curriculum policies*
- *Designated teacher for looked-after and previously looked-after children*
- *Privacy notices*
- *Recruitment and selection*
- *Whistleblowing*



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These appendices are based on the DfE's statutory guidance *Keeping Children Safe in Education*.

Appendix A: Types of abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others.

This can be particularly relevant in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

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

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.

Emotional abuse may involve

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or *making fun* of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children
- Verbal abuse such as criticism, belittling, or name-calling



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Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve

- Physical contact, including assault by penetration (for example rape, penetration with an object or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

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

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

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

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

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



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Appendix B: Allegations of abuse made against staff

Section 1: Allegations that may meet the harms threshold

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

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

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

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

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

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

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

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

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



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consulted

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

Definitions for outcomes of allegation investigations

Substantiated	There is sufficient evidence to prove the allegation.
Malicious	There is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation.
False	There is sufficient evidence to disprove the allegation.
Unsubstantiated	There is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence).
Unfounded	To reflect cases where there is no evidence or proper basis which supports the allegation being made.

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

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

Additional considerations for supply teachers and all contracted staff

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

We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome.

The governing body will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation.

We will involve the agency fully, but the school will take the lead in collecting the necessary



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information and providing it to the LADO as required.

We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).

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

Timescales

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

Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within one week

If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within three working days

If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

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

Specific actions

Action following a criminal investigation or prosecution	The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.
Conclusion of a case where the allegation is substantiated	If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.



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Individuals returning to work after suspension	If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this. The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.
Unsubstantiated, unfounded, false or malicious reports	If a report is • Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps; if they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate • Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it
Unsubstantiated, unfounded, false or malicious allegations	If an allegation is • Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps; if they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate • Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

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

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

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



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speculation

- How to manage press interest if, and when, it arises

Record keeping

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

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

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

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

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

We will retain all other records at least until the individual has reached normal pension age, or for ten years from the date of the allegation if that is longer.

References

When providing employer references, we will

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

Learning lessons

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

This will include consideration of (as applicable)



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

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

Non-recent allegations

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

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

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

Section 2: Concerns that do not meet the harm threshold

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

Concerns may arise through, for example

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

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

Definition of low-level concerns

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

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



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Examples of such behaviour include, but are not limited to

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

Sharing low-level concerns

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

We will create this culture by

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per “section 7.8” of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school’s safeguarding system

Responding to low-level concerns

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

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

The head teacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school’s policies. The head teacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the safeguarding team.

Record keeping

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



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rationale for decisions and action taken.

Records will be

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

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

References

We will not include low-level concerns in references unless one or both of the following conditions applies

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

Please see *Grange procedure for dealing with allegations made against staff* for more detail.



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Appendix C: Specific safeguarding issues

Assessing adult-involved nude and semi-nude sharing incidents

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to assess adult involvement at first.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images



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Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Children absent from education

A child being absent from education, particularly repeatedly and without explanation, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental



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health problems, substance abuse, radicalisation, FGM or forced marriage.

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

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

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

For Early Years pupils: If a pupil is absent for a prolonged period of time, or if a child is absent without notification from the parent or carer, attempts will be made to contact the child's parents and/or carers and alternative emergency contacts.

We will consider patterns and trends in a child's absences and their personal circumstances and use our professional judgement when deciding if the child's absence should be considered as prolonged.

Consideration will be given to the child's vulnerability, parent's and/or carer's vulnerability and their home life. Any concerns will be referred to local children's social care services and/or a police welfare check requested.

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

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

Where a parent of a pupil notifies the school that the pupil is registered at another school or



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will be attending a different school in future, the school will

- Ring and ask new school if they can confirm the transfer; if they can, follow normal procedures for transferring education records
- If new school cannot confirm pupil transfer, then ask Ealing's educational social worker (ESW) to try to contact the family; if successful, the ESW will then ring and confirm details with new school or treat case as non-attendance if the pupil is still at their old address; they will advise school of the outcome
- If the ESW cannot contact the family, they will try to trace them using information sought from: neighbours, housing records, other local authorities (LA), council tax, the social care team, information school gathers from other parents and support staff
- If successful the ESW will pass the details to new LA, the ESW Service and existing school
- If no contact can be found, the ESW will confirm the pupil should be removed from roll and ask the school to pass details to the social care team as either a pupil who has disappeared, but there are no known welfare concerns or as a case where the school is concerned for the pupil's welfare. (In such cases, a school may refer as soon as they are aware that the pupil is missing.)
- If a pupil *disappears* from roll and there is no preceding notice from the parent, school should refer to the ESW and latter three steps above would be followed; if there are concerns for the pupil's welfare, an urgent referral should be made to social care team.

Please see our *attendance policy* for more information.

Child criminal exploitation

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

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can be perpetrated by organised networks or gangs, and the victim may identify as part of this group. The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:



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

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

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. Most sexual abuse is committed by individuals known to the victim. It can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. Victims are not always recognised and can be criminalised for actions they take while under coercion. The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery. In addition to the CCE indicators above, indicators of CSE can include a child

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

If a member of staff suspects CSE, they will report it on CPOMS/discuss this with the DSL.



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The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

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

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the two.

Child-on-child abuse is a safeguarding issue for both victim and alleged perpetrator, it is preventable and it may involve serious physical harm or threats involving weapons.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

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

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Physical assault and harm, or the threat of harm with a weapon
- Harmful sexual behaviour (an umbrella term widely used in child protection, and which applies to behaviour occurring online, face-to-face, or both), sexual violence and sexual harassment, which may include misogyny/misandry
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual making or sharing of nudes and semi-nudes, and / or videos (also known as sexting or youth produced sexual imagery) including those generated using AI
- Upskirting, which is a criminal offence, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of nude or semi-nude



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images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or if a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Domestic abuse

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims. Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (the designated safeguarding lead) before the child or children arrive at school the following day, by email (Operation Encompass).

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

Homelessness

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



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

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

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

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

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

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

FGM

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

"Section 7.3" of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE
 - Being repeatedly absent from school, or absent for a prolonged period



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- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

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

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

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

Forced marriage

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

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.



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

If a member of staff suspects that a pupil is being forced into marriage, they will report it on CPOMS/discuss this with the DSL.

The DSL will

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

Preventing radicalisation

Radicalisation	refers to the process of a person legitimising support for, or use of, terrorist violence
Extremism	is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to: Negate or destroy the fundamental rights and freedoms of others; or Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or unintentionally create a permissive environment for others to achieve the results outlined in either of the above points
Terrorism	An action that • Endangers or causes serious violence to a person/people • Causes serious damage to property • Seriously interferes or disrupts an electronic system The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from becoming involved with or supporting



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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 becoming involved with or supporting 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 radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

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

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

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



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If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should always take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including our *PSHE policy* and *safety policy*.

Harmful sexual behaviour, sexual violence and sexual harassment between children in schools

The school will respond to all signs, reports and concerns of harmful sexual behaviour (HSB), child-on-child sexual harassment and sexual violence. This includes incidents occurring outside of the school premises, and/or online.

Sexual violence refers to specific sexual offences under the Sexual Offences Act 2003 involving:

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration, and A does not reasonably believe that B consents
- Assault by penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents
- Sexual assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents. Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault)
- Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party)

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity, and each time activity occurs. A child under the age of 13 can never consent to any sexual activity, the age of consent is 16, and sexual intercourse without consent is rape.

HSB can occur:



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

HSB exists on a continuum and may escalate into sexual harassment or sexual violence. It can occur online or face-to-face (both physically and verbally) and is never acceptable. Sexual violence and sexual harassment may overlap.

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

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

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay and bisexual children, or children questioning their gender are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them
- Recognising the intersection of misogyny/misandry and harmful sexual behaviour. It's important not to dismiss issues that may seem minor at first, such as derogatory language, as behaviours can escalate into more severe forms of child-on-child abuse



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If staff have any concerns about HSB, sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Serious violence

Serious violence is a continuing safeguarding concern which may involve:

- Physical assault
- Carrying, threatening with or using weapons (often in the context of peer conflict or bullying)
- Criminal exploitation

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

- Increased absence from school
 - Change in friendships or relationships with older individuals or groups
 - Significant decline in performance
 - Signs of self-harm or a significant change in wellbeing
 - Signs of assault or unexplained injuries
 - Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))
- Risk factors which increase the likelihood of involvement in serious violence include:
- Being male
 - Having been frequently absent, suspended, spent time in alternative provision or permanently excluded from school
 - Having experienced child maltreatment
 - Having been involved in offending, such as theft or robbery
 - Having used drugs or alcohol in early adolescence
 - Having previously been a victim or previously perpetrated violence

Staff will be aware of these indicators and risk factors and will be alert to when children might be at highest risk around the school day (for example, immediately after school). If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

The DSL will:



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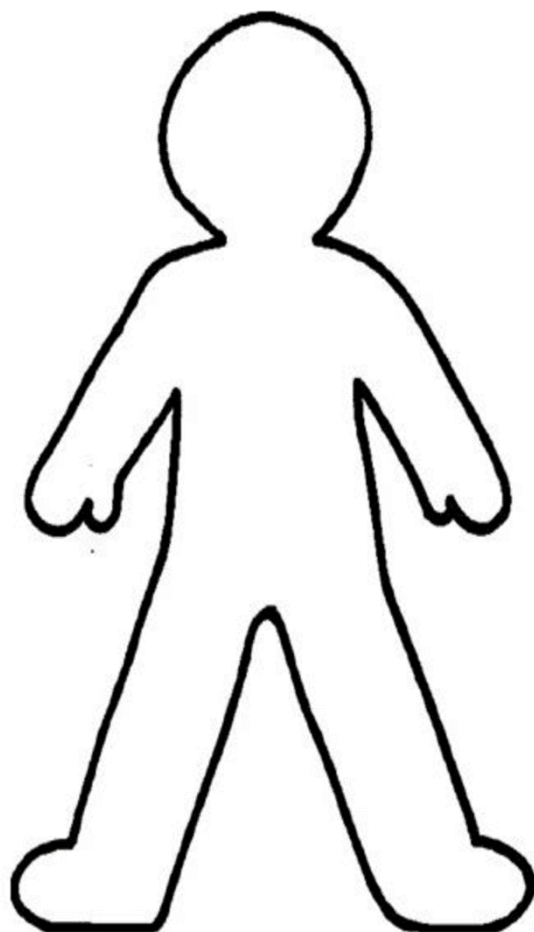
- Assess the risk to both the individual pupil and others in the school, consider wider information or concerns and take appropriate action
- Put in place a safety and support plan for the pupil (depending on the risk)
- Where relevant, consider action to de-escalate peer conflict

Appendix D: Grange body map

Date	Time	Front view (Tick)	Back view (Tick)	Observed by
Comments				



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Appendix E: Safeguarding concern (known as *Orange Form*)

Name of pupil:	YG/Class:
Date:	Time:
Name of adult reporting concern:	
Role of adult reporting concern:	
Nature of concern:	



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Action/s agreed by designated safeguarding lead:

To be processed by :

Time scale:

This form must remain CONFIDENTIAL

**Complete the form as soon as possible and pass on to the designated
safeguarding lead**