



# St Paul's Catholic Primary School

## Child Protection and Safeguarding Policy September 2024-2025

<p><b>Mission:</b> <i>Our pupils and all members of our school community encompass, celebrate and live our values by: <b>Journeying together, The St Paul's Way.</b></i></p>
<p><b>Our Vision</b> <i>An exceptional community where acceptance, compassion and diversity is valued. We will encourage and inspire our children to serve God for the good of all, to excel in their learning and be resilient and caring. Our community will recognise, celebrate and protect God's gift of the world through the provision of a creative, relevant and ambitious curriculum which enables our children to be confident and prepared for modern life.</i></p>
<p><b>Our Values:</b> <i>Respect, Friendship, Perseverance, Honesty, Caring, Thankfulness and Confidence which are rooted in the Gospels of Jesus Christ and we support and encourage those values which form our modern British Society – Democracy, Rule of Law, Individual liberty, mutual respect and tolerance (value) of those of different faiths and beliefs.</i></p>

Signed (chair):	Name:	Date:
Signed (Head):	Name:	Date:
Ratified by: Governing Body on: 15 <sup>th</sup> October 2024		Next Review: September 2025

Role	Name	Contact Details
Designated Child Protection Person	Maxine Sewell (Head Teacher)	01454 866790
Deputy Designated Child Protection Persons	Claire Rogers (Deputy Head Teacher)	01454 866790
	Laura Holbrook (Humanities Lead)	01454 866790
Safeguarding Governor	Mrs Carol Lawler	<a href="mailto:carol.lawler@stpaulscatholicprimary.co.uk">carol.lawler@stpaulscatholicprimary.co.uk</a>
Chair of Governors	Mrs Carol Lawler	<a href="mailto:carol.lawler@stpaulscatholicprimary.co.uk">carol.lawler@stpaulscatholicprimary.co.uk</a>
LADO (Local Authority Designated Officer)	Jon Goddard	01454 868924
Art (Access and Response Team)	For direct referral of concerns	01454 866000
Out of Hours Duty Team (emergency)	For emergency referrals – which need to be made outside normal working hours	01454 615165

Southwest Child Protection Procedures: [Welcome to the South West Child Protection Procedures \(trixonline.co.uk\)](http://trixonline.co.uk)

Keeping Children Safe in Education:

[https://assets.publishing.service.gov.uk/media/6650a1967b792ffff71a83e8/Keeping\\_children\\_safe\\_in\\_education\\_2024.pdf](https://assets.publishing.service.gov.uk/media/6650a1967b792ffff71a83e8/Keeping_children_safe_in_education_2024.pdf)

South Gloucestershire Children's Partnership: <http://sites.southglos.gov.uk/safeguarding/wp-content/uploads/sites/221/2015/05/South-Gloucestershire-Childrens-Partnership-Arrangements-Final-09-July.pdf>

Statutory Guidance: Working Together to Safeguard Children: <https://www.gov.uk/government/publications/working-together-to-safeguard-children-2>

NCCP: When to call the police:

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

Departmental Advice: What to do if you are worried a child is being abused, advice for practitioners:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419604/What\\_to\\_do\\_if\\_you\\_re\\_worried\\_a\\_child\\_is\\_being\\_abused.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf)

Departmental Advice: Mental health and behaviour in schools:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/755135/Mental\\_health\\_and\\_behaviour\\_in\\_schools\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/755135/Mental_health_and_behaviour_in_schools_.pdf)

Updated Flowchart: Child on Child Abuse: [https://6282.s3.eu-west-](https://6282.s3.eu-west-1.amazonaws.com/Flowchart+Sexual+Violence+and+Sexual+Harassment+2022.pdf)

[1.amazonaws.com/Flowchart+Sexual+Violence+and+Sexual+Harassment+2022.pdf](https://6282.s3.eu-west-1.amazonaws.com/Flowchart+Sexual+Violence+and+Sexual+Harassment+2022.pdf)

<https://www.gov.uk/government/publications/supporting-pupils->

[SEND code of practice: 0 to 25 years - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/supporting-pupils-)

[Find your local IAS service \(councilfordisabledchildren.org.uk\)](https://www.councilfordisabledchildren.org.uk)

<https://www.mencap.org.uk/>

<https://learning.nspcc.org.uk/safeguarding-child-protection/SEND>

# Equality Impact Assessment (EIA)

## Part 1: EIA Screening

<b>Policies, Procedures or Practices</b>		<b>Date</b>	September 2024
<b>EIA CARRIED OUT BY:</b>	Carol Lawler	<b>EIA APPROVED BY:</b>	Maxine Sewell

**Groups that may be affected: Any adverse impacts are explored in a Full Impact Assessment.**

Are there any concerns that the policy could have a different impact on any of the following groups? (please tick the relevant boxes)	Existing or potential adverse impact	Existing or potential for positive impact
Age (young people, the elderly: issues surrounding protection and welfare, recruitment, training, pay, promotion)		YES
Disability (physical and mental disability, learning difficulties; issues surrounding access to buildings, curriculum and communication).		YES
Gender Reassignment (transsexual)		YES
Marriage and civil partnership		YES
Pregnancy and maternity		YES
Racial Groups (consider: language, culture, ethnicity including gypsy/traveller groups and asylum seekers)		YES
Religion or belief (practices of worship, religious or cultural observance, including non-belief)		YES
Gender (male, female)		YES
Sexual orientation (gay, lesbian, bisexual; actual or perceived)		YES

**DEFINITIONS** (as from the updated Working Together to Safeguard Children, Feb 2024)

**Child Protection**

Child Protection is a part of Safeguarding and promoting the welfare of children and is defined for the purposes of this guidance as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside of the home, including online.

**Safeguarding**

Effective safeguarding means practitioners should understand and be sensitive to factors, including economic and social circumstances and ethnicity, which can impact children and families' lives.

**RATIONALE**

In accordance with our mission, vision and values as shown on the front page of this policy, the protection, health, safety and welfare of all our children are of paramount importance to all the adults who work in our school. Our children have the right to protection, regardless of age, gender, race, culture or disability. They have a right to be safe in our school, therefore St Paul's Catholic Primary School will ensure it creates a culture of awareness and vigilance to protect all pupils in our care.

As a school, we will ensure all those working with the pupils in our care understand that there could be wider environmental factors in a child's life that may be a threat to their safety and welfare (Contextual safeguarding) and that if identified, these factors should be shared with the Designated School Lead in the same way as any other disclosures/concerns. All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours, (whether that of the child themselves or by the adults with responsibility for them or other adults in their lives), linked to such issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images/videos can be signs that children are at risk.

This policy also recognises that all staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. We will ensure that our ethos is such that this should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

This policy has been compiled using the South Gloucestershire Education Service model safeguarding policy and Keeping Children Safe in Education 2023 (KCSiE).

A copy of this policy Child Protection and Safeguarding Policy is available on request to parents/carers and is also accessible via the school website <https://www.stpaulscatholicprimary.co.uk/>

Our policy applies to all staff including supply teachers, volunteers, and governors working in the school. Concerned parents/carers may also contact the Designated Safeguarding Lead (DSL) or in their absence, the Deputy Safeguarding Leads.

Throughout this policy 'children', 'child' or 'young person' refer to anyone under the age of 18 years old.

As governors and leaders of St Paul's Catholic Primary School we recognise the need for all within our community to be alert to the risks posed by those who may wish to harm children and young people in school or travelling to and from school and their homes, and to understand and know that children can and do harm each other (child on child abuse) and therefore will maintain an attitude that "it could happen here" and to "think the unthinkable" where safeguarding is concerned.

## PRINCIPLES

Section 175 of the Education Act 2002 gives maintained schools a statutory duty to promote and safeguard the welfare of children, and have due regard to guidance issued by the Secretary of State including:

- Keeping Children Safe in Education 2024 (KCSiE)
- Equality Act 2010
- Prevent Duty Guidance 2015
- Working Together to Safeguard Children 2018 (last updated February 2024)
- What to do if you are worried a child is being abused 2015, (updated 2018)
- Information Sharing, 2018
- Childcare Act, 2006 (amended 2018)
- Sexual Violence and Sexual Harassment Between Children, May 2018
- <https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>
- Child Sexual Exploitation DfE Guidelines, Feb 2017
- Local Authority Guidelines for Children Missing Education, Sept 2016

- Information sharing: advice for practitioners providing safeguarding services, DfE, 2018
- Teaching online safety in schools, June 2019
- OFSTED Inspection Framework, 2019
- OFSTED Inspecting Safeguarding in Early Education and Skills, Sept 2019
- Relationship Education, Relationship and Sex Education and Health Education, September 2020

All staff are expected to have read and familiarised themselves with the above documents, which can be found in the Staff Safeguarding Folder on the **J drive**. (A file containing hard copies of these documents can be found in the Staff Room).

This school recognises its legal and moral duty to promote the well-being, both physical and mental, of children, protect them from harm, and respond to child abuse and exploitation. We acknowledge our responsibilities to both protect children from physical and mental maltreatment and prevent impairment and will seek to provide help and support to meet the needs of children as soon as problems emerge. We will promote their physical and mental welfare by creating opportunities for them to achieve their full potential, thus giving them optimum life chances in adulthood.

We believe that every child regardless of age has at all times and in all situations a right to feel safe and protected from any situation or practice that results in a child being physically, emotionally or sexually damaged, or harmed by neglect. This includes any form of bullying, physical, emotional and online, and any form of child-on-child abuse, including sexual violence and sexual harassment.

At St Paul's Catholic Primary School, we ensure (through training and effective communication) that all staff are aware that safeguarding incidents and/or behaviour can be associated with factors outside our school and can occur outside of our school environment, both in the home or community. All staff, especially the Designated and Deputy Safeguarding Leads should consider whether children are at risk of abuse or exploitation in situations both within and outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence.

We recognise that many of the risks to children in the 'real world' equally apply to the 'virtual world' that children and young people may encounter when they use ICT in its various forms. We take seriously our responsibility to educate our children to help them to become safe and responsible users of new technologies, and allow them to be discriminating users of both the content they discover and the contacts they make online. Our aim is to teach them the appropriate behaviours and critical thinking skills to remain both safe and legal online, wherever and whenever they use technology. To ensure the online safety of our pupils, Governors ensure the school has rigorous protection systems for our school IT devices by using Integra IT to provided, monitor and report on our filtering and monitoring systems. As part of both Safeguarding training and IT training staff are trained to recognise these risks and to mitigate them in their teaching and to report any concerns immediately to both the IT Lead and the DSL. The IT Lead oversees online safety in the school and Governors receive an annual report re the filtering and monitoring systems. The Safeguarding Governor is responsible for monitoring filtering and monitoring and is informed if there are any breaches of our systems.

We agree that we have a primary responsibility for the care, welfare and safety of the pupils in our charge and to ensure that children grow up in circumstances consistent with the provision of safe and effective care. We will carry out this duty through our teaching and learning, extra-curricular activities, pastoral care and extended school activities. In order to achieve this, all members of staff (including volunteers and governors) in this school, in whatever capacity, will at all times act proactively in child welfare matters especially where there is a possibility that a child may be at risk of significant harm. In exceptional circumstances contact may be made directly to South Gloucestershire Children's Partnership.

The school seeks to adopt an open and accepting attitude towards children as part of their responsibility for pastoral care. The school hopes that parents and children will feel free to talk about any concerns and will see school as a safe place if there are any difficulties at home.

Children's worries and fears will be taken seriously if they seek help from a member of staff. However, staff cannot and must not promise secrecy if concerns are such that referral must be made to the appropriate agencies in order to safeguard the child's welfare. At St Paul's Catholic Primary School we will ensure all victims will be taken seriously, kept safe and never made to feel like they are creating a problem for reporting any form of abuse, exploitation, sexual violence or sexual harassment.

Our school believes in the importance of early identification of issues for children and young people. We fully endorse the principles of multi-agency working and will engage in the Early Help Assessment Process (EHAP) process for any child in our school for whom we feel this is appropriate.

In our school, if we have suspicions that a child's physical, sexual or mental and/or emotional wellbeing is being, or is likely to be, harmed, or that they are being neglected, we will take appropriate action in accordance with the procedures of South Gloucestershire Children's Partnership (Sept 2019) see link below: <https://sites.southglos.gov.uk/safeguarding/>

#### **Children Potentially at Greater Risk of Harm**

St Paul's Catholic Primary School recognises that the following groups of children are potentially at greater risk of harm: children who need a social worker (Child in Need and Child Protection Plan), Looked after Children, children with SEND, Children Missing Education and Gender Questioning children and this will inform school decisions about their safeguarding and wellbeing. The DSL will take the lead to ensure school-based support for these children and work closely, with all agencies involved in supporting the child, including information sharing. It is recognised that these children may need increased opportunities in school to support their learning and wellbeing.

Where the school is aware that children may be missing in education (unexplainable and/or persistent absences from education) they will immediately liaise/inform South Gloucestershire Local Authority. Staff recognise that children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to possible safeguarding issues including neglect, child sexual and criminal exploitation, including county lines. Our response to persistently absent children supports identifying such possible abuse and/or exploitation and aims to prevent the children become identified as missing education in the future. This includes initial emerging absences and also when children are already known to social Services and who may have a social worker.

Where parents indicate they are electing to home educate their children, the DSL will work with them and with South Gloucestershire LA and other relevant professionals to ensure that a decision is made in the best interest of the child. This is particularly important where the child is vulnerable, has SEND or has a social worker. When a child/children is/are taken off roll for the purposes of home education then St Paul's Catholic Primary School will immediately inform the local authority.

At St Pauls Catholic Primary School we are aware that should any of our pupils be placed in alternative provision, including a pupil referral unit, for any length of time it is our duty and responsibility to continue to ensure the protection, safeguarding and wellbeing of that pupil and will take steps to ensure we are satisfied the alternative provision is meeting the needs of the child.

LGBT/ Gender Questioning Pupils - Children who are lesbian, gay, bi, or Trans (LGBT): the fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be

compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that our staff endeavour to reduce the additional barriers faced, and provide a safe space for our children and parents are able to speak out or share their concerns with members of staff. LGBT inclusion is part of the schools Relationships Education, Relationship and Sex Education and Health Education curriculum and if necessary the school will access the range of support available to help schools counter homophobic, biphobia and transphobic bullying and abuse.

Children who are questioning their gender are not inherently at more risk of harm, however the Cass Review has identified that caution is necessary re children questioning their gender as there remains many unknowns about the impact of social transition and children may have wider vulnerabilities, including having complex mental health and psychosocial needs and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.

It is recommended that when families/carers are making decision about support for gender questioning children they should be encouraged to seek clinical advice and help and staff should be able to point them to these support services. However schools should take a cautious approach and consider the broad range of the individual child's needs. Risks to gender questioning children can be compounded where children lack trusted adults with whom they can be open, therefore at St Paul's in line with our mission, vision and values we will endeavour to reduce additional barriers faced by the children and to create a culture where all can speak out or share their concerns with staff. At St Paul's school we will always try to work in partnership with parents and carers (unless the DSL feels there is significant risk of harm to the child if parents/carers are involved) and refer to the Guidance for Schools and Colleges in relation to Gender Questioning children

[https://consult.education.gov.uk/equalities-political-impartiality-anti-bullying-team/gender-questioning-children-proposed-guidance/supporting\\_documents/Gender%20Questioning%20Children%20%20nonstatutory%20guidance.pdf](https://consult.education.gov.uk/equalities-political-impartiality-anti-bullying-team/gender-questioning-children-proposed-guidance/supporting_documents/Gender%20Questioning%20Children%20%20nonstatutory%20guidance.pdf)

#### **Virtual School Head**

The Virtual school head for South Gloucestershire Local Authority manages pupil premium plus for all looked after children in St Paul's Catholic Primary School; the designated teacher for Looked after Children (In St Paul's this is the Designated Safeguarding Lead) works with the virtual school head to discuss how funding can be best used to support the progress of our looked after children and meet the needs identified in their personal education plan. The DSL also works with the virtual school head to promote the educational achievement of any previously looked after children.

In addition to their statutory duties, the role of virtual school heads was extended in June 2021, to include a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker.

#### **List of Possible Risks to All Children**

Safeguarding action may be needed to protect children and learners from:

- Neglect
- Physical Abuse
- Sexual Abuse
- Emotional Abuse
- Bullying, including online bullying and prejudice-based bullying
- Racist, Disability and Homophobic or Transphobic Abuse

- Gender-Based Violence/violence against women and girls
- Radicalisation and/or extremist behaviour
- Child Sexual Exploitation (CSE) and trafficking
- Child Criminal exploitation (CCE)
- County Lines exploitation
- The impact of new technologies on sexual behaviour, for example the sharing of nude and semi-nude images (previously known as sexting)
- Self-harm
- Teenage Relationship Abuse
- Substance Misuse
- Issues that may be specific to a local area or population, for example gang activity and youth violence
- Domestic Violence – domestic violence (where they see, hear or experience its effects) can have a devastating impact on children when they witness it at home and/or suffer it in an intimate personal relationship
- Female Genital Mutilation (including the mandatory duty to report FGM disclosures)
- Chest Ironing
- Forced marriage and Honour-based abuse
- Terrorism and non-violent extremism
- Fabricated or induced illness
- Poor parenting, particularly in relation to babies and young children
- Grooming by a Professional
- Child -on- Child abuse
- Sexual Violence and Sexual Harassment between Children
- Up Skirting

Further information and explanations of these risks can be found on page 25.

#### **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

Both CSE and CCE are abuse that affects male and female children, including children who have been moved geographically (commonly referred to as trafficking) for the purposes of exploitation. These kinds of abuse occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may or may not, be accompanied by violence or threats of violence.



Victims can be exploited even when activity appears consensual, and it should be noted that exploitation can be facilitated in the real world and/or online.

### **Child Criminal Exploitation (CCE)**

Some specific forms of CCE can include being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and/or their families) with violence or entrap them into debt. They may be coerced into carrying weapons or carry a knife for a sense of protection from others. As criminally exploited children they may often commit crimes themselves and their vulnerability as victims may not be recognised by adults and/or professionals (particularly older children) so they are not always treated as victims despite the harm they have experienced. They may have still been criminally exploited even if they appear to have consented to the activity.

It is also important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same but professionals should be aware that girls are also at risk of CCE too.

It is also important to be aware that both boys and girls who are criminally exploited may be at higher risk of sexual exploitation.

### **Child Sexual Exploitation (CSE)**

CSE is a form of sexual abuse, it may involve physical contact, including assault by penetration (rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It may include non-contact activities such as involving children in the production of sexual images, forcing children to view sexual images or activities and encouraging children to behave in a sexually inappropriate way or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, e.g. through others sharing videos or images on social media.

CSE can affect any child who has been coerced into engaging in sexual activity. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited – they may believe they are engaging in a genuine romantic relationship.

### **Mental Health**

All staff should be aware that 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. Only appropriately trained professionals should make a diagnosis of a mental health problem; however, school staff are well placed to observe children on a daily basis and to identify those whose behaviour may suggest they have a mental health problem or be at risk of developing one.

At St Paul's Catholic Primary School we are aware that schools can access arrange of advice to help us identify children in need of extra mental health support, including working with external agencies, including CAMHs (Child and Mental Health Services). More information can be found in the Mental Health and Behaviour in Schools Guidance.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/755135/Mental\\_health\\_and\\_behaviour\\_in\\_schools\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/755135/Mental_health_and_behaviour_in_schools_.pdf)

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

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this Child Protection and Safeguarding Policy and by speaking immediately to the Designated Safeguarding Lead (DSL).

**Private Fostering:** When individual cases of Private Fostering<sup>1</sup> arise within the school, we exercise the mandatory duty to inform the local authority.

### **Child-on-Child Abuse (Also see Child on Child Abuse Policy)**

At St Paul's Catholic Primary School, we believe that all children have a right to attend school and learn in a safe environment. All our children must be free from harm by adults and other pupils. DfE guidance Keeping Children Safe in Education says that "governing bodies should ensure there are procedures in place to handle allegations against other children (Child-on-Child Abuse)". The guidance also states the importance of minimising the risks of child-on-child abuse.

In most instances, the conduct of our pupils towards one another will be covered by the St Paul's Mission, Vision and Values and the school's expectation is that all pupils follow "The St Paul's Way". Certain policies will also set out governor's expectation of how pupils and staff should respond to each other, including this Child Protection and Safeguarding Policy, the school's behaviour and anti-bullying policies, staff code of conduct and the expectation on staff to respond with a safeguarding focus to pupils missing or absent from education.

Despite our ethos, we recognise that some pupils will occasionally negatively affect the learning and well-being of others – pupils and staff - and such behaviour will be dealt with under the policies identified above. However, it is recognised that there may be times when pupil's behaviour towards each other will raise safeguarding concerns and therefore will be dealt with under the procedure outlined on pages 12 & 13 of this policy.

Should child on child abuse occur, St Paul's Catholic Primary School will do our best to ensure all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school will not be downplayed and will be treated equally seriously. Our children should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor should they ever be made to feel ashamed for making a report. It is important to explain to the children involved that the law is in place to protect them rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

We are also aware that child on child abuse can happen within families and staff will be aware of the importance of understanding intra familial harms and the need for any necessary support for siblings following reported incidents.

At St Paul's Catholic Primary school we will, as part of our Mission, Vision and Values, seek to prevent bullying and child-on-child abuse by promoting resilience and St Paul's Way as part of our whole school

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<sup>1</sup> Private Fostering is when a child under the age of 16 (18 if disabled) is cared for by a person not their parent or close relative. This is a private arrangement made between a parent and a carer for more than 28 days.

approach to Personal, Social, Health and Emotional education programme. We will use as appropriate the DfE advice and guidance on Preventing and Tackling Bullying, Mental Health and Behaviour in Schools. [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/623895/Preventing\\_and\\_tackling\\_bullying\\_advice.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/623895/Preventing_and_tackling_bullying_advice.pdf)

Child-on-Child Abuse is most likely to include but not limited to:

- Bullying (including cyberbullying, prejudice-based and discriminating bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual Violence such as rape, assault by penetration and sexual assault (this may include an online element which facilitates threatens and/or encourages sexual violence)
- Sexual Harassment such as sexual comments, remarks, jokes and online sexual harassment which may stand alone or be part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent such as forcing someone to strip, touch themselves sexually or engage in sexual activity with a third party
- Consensual and nonconsensual sharing of nude and semi-nude images and or videos/recordings (also known as sexting or youth produced sexual imagery)
- Up-Skirting, 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 involve activities such as harassment, abuse or humiliation used as a way of initiating a person into a group and may include an online element)

Child-on-Child abuse can happen both within and outside of school and also online. Staff should understand that even if pupils are not reporting child-on-child abuse, it could still be happening but going unreported. If any member of staff suspect child-on-child abuse could be happening they must report concerns to the DSL.

At St Paul's Catholic Primary School we recognise the importance of challenging any inappropriate behaviours between children that are actually abusive in nature (see list below). Downplaying certain behaviours as "banter, having a laugh, part of growing up or boys being boys" can lead to a culture of unacceptable behaviours and create an unsafe environment for children. In the worst case scenario, it can create a culture that normalises abuse leading children to accepting such a culture as normal and not coming forward to reporting it.

The terms "children", "child" or "young person" refers to anyone under the age of 18 years old.

#### **Definitions**

- The definition for domestic abuse (Home Office, 2013) relates to young people aged 16 and 17 who experience (see, hear or experience its effects) physical, emotional, sexual and/or financial abuse and coercive control in their intimate relationships.
- The definition for child sexual exploitation (DfE, 2017) captures children and young people under the age of 18, who are sexually abused in the context of exploitative relationships, contexts and situations by a person of any age – including another child and/or young person.
- The definition for young people who display harmful sexual behaviour refers to any young person under the age of 18, who engages in "sexual discussions or acts that are inappropriate for their age or state of development" (Rich, 2011). Children and young people can also engage in harmful

sexual behaviour online or through the use of technology, e.g. grooming, exposing others to extreme/illegal pornography, sexual images and/or chat (Belton and Hollis, 2016)

- Serious youth violence is defined with reference to offences (as opposed to relationships/contexts) such as violence against a person, sexual offences, robbery or gun or knife crime (Metropolitan Police, 2016)

### **The Safeguarding Implications of Sexual Activity between Young People\***

The intervention of child protection agencies in situations involving sexual activity between children can require professional judgments. Some situations are statutorily clear – for example, a child under the age of 13 cannot consent to sexual activity. But it will not necessarily be appropriate to initiate safeguarding procedures where sexual activity involving children and young people below the age of legal consent (16 years) comes to notice. In our society generally the age at which children become sexually active has steadily dropped. It is important to distinguish between consensual sexual activity between children of a similar age (where one at least is below the age of consent) and sexual activity involving a power imbalance, or some form of coercion or exploitation.

### **Prevention**

At St Paul's Catholic Primary School we will minimise the risk of allegations of child-on-child abuse by:

- Providing PSHE as part of the curriculum, which will help pupils develop their understanding of acceptable behaviours, healthy relationships and keeping themselves safe
- The PSHE Curriculum will also provide Relationships and Sex Education using a variety of teaching schemes of work and resources
- Having effective systems within our school for children to be able to raise concerns with staff, knowing they will be listened to, supported and valued and that the issues they raise will be looked into and addressed
- Liaising and working with other professionals to develop robust risk assessments for pupils that are identified as posing a potential risk to other students
- Liaising with specialists to deliver appropriate targeted work and support to pupils identified as being at potential risk

Commented [SH1]: PSHE?

Commented [SH2]: PSHE?

### **Allegations against other pupils (safeguarding issues)**

Allegations of abuse that are a safeguarding concern maybe made against pupils within our setting. These may include allegations of physical, emotional and or sexual abuse or exploitation. Also we are aware that safeguarding concerns or reports of abuse in any form may be made against pupils within our setting.

It may also be considered a safeguarding issue if the allegation:

- Is being made against an older pupil and refers to their behaviour towards a younger or more vulnerable child
- Is of a possible criminal nature
- Puts other children in school at risk or raises the risk factor for others
- Indicates that other pupils may have been harmed or at risk of harm
- Includes bullying (under the definition of emotional abuse) or intimidation

### **Early Help**

As per KCSIE2024 and in line with managing internally, the DSL (in consultation with the DDSL's and the Safeguarding Governor) may decide that the children involved do not require referral to statutory services but may benefit from Early Help and should know and understand the local early help process is and where

to access support (see pages 15 & 16). Early help may improve a family's resilience and outcomes and reduce the chance of problems escalating, and can be more effective in promoting the welfare of children than reacting at a later stage. Early help can be particularly helpful to address non-violent HSB (Harmful Sexual Behaviour) and may prevent escalation of sexual violence.

#### **Procedure**

- When an allegation is made by a pupil against another pupil which is of a safeguarding nature it should be reported to the DSL as soon as possible (see contact details on the front of policy and Appendix 5 – referral flowchart)
- A factual record must be kept (as normal safeguarding child protection procedures) and updated with all outcomes and actions
- The incident should not be investigated at this time
- The DSL will contact the Access and Response Team (ART) to discuss the case and make a formal referral where appropriate
- If the allegation indicates a crime has taken place, ART will refer the case to the police
- Parents/Carers of both the alleged victim and the student being complained about should be informed – this must be discussed during the consultation with ART
- A risk assessment will be carried out and actioned in order to protect all parties involved, this may involve a supervision plan
- It may be appropriate, for a fixed period of time, to exclude the pupil against whom the allegation has been made – in line with the school's behaviour policy
- Police and Social Care will lead any investigation, however where neither police nor social care thresholds are met, school will undertake a thorough investigation following the appropriate procedures and policies
- Support will be given to all pupils involved and where appropriate they should be in attendance at all relevant meetings and sign and agree to any plan put in place
- The plan should be monitored and review dates set

#### **If Allegations are Made Directly to Other Agencies**

In some circumstances, parents/carers or the alleged victim(s) may disclose to other settings or agencies. In these cases (if not police or social care) these agencies should make referrals to ART or the police.

ART or the police should liaise directly with the DSL for the school in order to inform them of the allegations/situation.

All professionals involved can support the risk assessment and management of such allegations.

#### **Police Action and Responsibility**

Avon and Somerset Police will make an assessment on a case-by-case basis as to the legality, proportionality and necessity to share information with partner agencies, including schools.

Where a report is made concerning a school-aged child and the school is already involved, the police should keep the DSL for that setting updated with developments in the case. In South Gloucestershire, schools receive domestic abuse reports where the children are involved in those cases where the police identify a safeguarding need.

Where a report is made concerning a school aged child and the school is not already involved, the police must always give active consideration to sharing information with the setting. This will ensure that the setting can take necessary measures to ensure the safety of the children involved and others they may

come into contact with. The decision on the appropriate measures to take should be made by the setting with advice and support from the police as necessary.

In the case of police or court bail conditions for safeguarding cases, the police must notify the setting of the conditions which are relevant to keep the child and others in the setting safe.

If a report indicates a safeguarding concern regarding a child or a risk they may pose to others, the presumption is the report will be shared with those who need to know to help keep children safe. A review strategy meeting may be the most appropriate way of communicating and agreeing a suitable course of action.

### **Serious Violence**

It is important that all staff are aware of the indicators which may signal children are at risk from or involved with serious violent crime. Staff should also appreciate that these children are the victims of abuse and/or exploitation. This may include increased absence from school, a change in relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by or are involved with individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

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

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

Advice can be found in the Home Office's "Preventing youth violence and gang involvement" and its "Criminal exploitation of children and vulnerable adults: county lines" guidance documents.

### **Prevent Duty**

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 to have "due regard" to the need to prevent people from becoming terrorists or supporting terrorism (The Prevent Duty).

This duty is seen as a wider part of our safeguarding of children work and is therefore a part of this policy. The DSL and Deputy DSL's are familiar with the Prevent Duty Guidance for England and Wales paras – 141-210 which are especially concerned with education [Prevent duty guidance: England and Wales \(2023\) - GOV.UK \(www.gov.uk\)](#).

The school leaders are aware of the local procedures for making a prevent referral.

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harm, abuse and exploitation, protecting children from this risk forms part of St Paul's approach to safeguarding. The following explains the three main risks to pupils:

**Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This includes calling for the death of members of the armed forces.

(New definition reads: 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 parliamentary democracy and democratic rights, or
- Intentionally create a permissive environment for others to achieve the results in the first two bullet points.)

**Radicalisation** refers to the process by which a person (young person) comes to support terrorism and idealist ideologies associated with terrorist groups. **Radicalisation** is the process of a person legitimising support for, or use of, terrorist violence

**Terrorism** is an action that endangers or causes serious violence to a person/people, causes serious damage to property, or seriously disrupts an electronic system or infrastructure. The use or threat 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.

Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism there are factors that may indicate concern. [Managing risk of radicalisation in your education setting - GOV.UK \(www.gov.uk\)](http://www.gov.uk/government/publications/managing-risk-of-radicalisation-in-your-education-setting)

It is possible to protect people from extremist ideology and to intervene to prevent those at risk of radicalisation into being drawn into terrorism. As with other safeguarding risks, our staff will be alert to changes in children's behaviour which could indicate they may be in need of protection and use their professional judgement in identifying these children and act proportionately, including reporting to the DSL or Deputy DSL and making a Prevent Referral [Making a referral to Prevent - GOV.UK \(www.gov.uk\)](http://www.gov.uk/government/publications/making-a-referral-to-prevent)

We take seriously our responsibility to promote British values and enable children to learn about differences and be tolerant and understanding of others. Children who demonstrate the values are celebrated through our "City of Values" display, which is made reference to through lessons and assemblies. Children have opportunities to learn about other world religions and understand those with views different to their own.

As a consequence, we

- Assert that teachers and other members of staff (including volunteers) in the school are an integral part of the child safeguarding process
- Accept totally that safeguarding children is an appropriate function for all members of staff in the school, and wholly compatible with their primary pedagogic responsibilities
- Recognise that safeguarding children in this school is a responsibility for all staff, including volunteers, and the governing body
- Will ensure, through training and supervision, that all Governors, staff and volunteers in the school are alert to the possibility that a child is at risk of suffering harm, and know how to report concerns or suspicions
- Will designate a senior member of staff with knowledge and skills in recognising and acting on child protection concerns: he or she will act as a source of expertise and advice, and is responsible for co-ordinating action within the school and liaising with other agencies
- Ensure (through the designated member of staff) that staff with designated responsibility for child protection will receive appropriate training to the minimum standard set out by South Gloucestershire Safeguarding Children's Partnership
- Will share our concerns with others who need to know, and assist in any referral process
- Will ensure that all members of staff and volunteers who have suspicion that a child may be suffering, or may be at risk of suffering, significant harm refer such concerns to the Designated member of staff

who will refer on to Children's Social Care in accordance with the procedures issued by South Gloucestershire Safeguarding Children's Partnership, which came into force on the 29<sup>th</sup> Sept 2019. This new body is a partnership between The Local Authority, Police and Clinical Commissioning Group (CCG)

- Safeguard the welfare of children whilst in the school through positive measures to address bullying, especially where this is aggravated by sexual or racial factors, disability or special educational needs, or technology
- Will ensure that all staff are aware of the child protection procedures established by South Gloucestershire Safeguarding Children Board and, where appropriate, the Local Authority, and act on any guidance or advice given by them
- Will ensure, through our recruitment and selection of volunteers and paid employees, that all people who work in our school are suitable to work with children will act swiftly and make appropriate referrals where an allegation is made that a member of staff has committed an offence against a child, harmed a child, or acted in a way that calls into question their suitability for working with children

**Children Missing Education (also see Attendance Policy)** Children missing education (demonstrating unexplainable and/or persistent absences from education) can be at risk of harm. To prevent harm coming to our pupils we will have at least two emergency contact telephone numbers for each child. See also page 5.

#### **Early Help**

Keeping Children Safe in Education states that "All staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years" (p. 5-6). Staff should discuss early help requirements with the DSL (or a deputy).

Commented [SH3]: 2024?

Whilst any child may benefit from early help, our staff should be particularly alert to the potential need for early help for a child who:

- Is disabled or has certain health conditions and has additional specific needs
- Has special educational needs (whether or not they have a statutory Education, Health Care Plan), these children will be closely supported by the Special Needs Lead working with the DSL. Useful websites to support these children are included at the beginning of this policy, and The
- Has a mental health need
- Is a young carer
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Frequently is missing from education, home or care
- Has experienced multiple suspensions, is at risk of being permanently excluded, in alternative provision or a Pupil Referral Unit
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is in a family circumstance presenting challenges to the child such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing alcohol and/or other drugs themselves



- Is at risk of so called “honour based” abuse such as Female Genital Mutilation or Forced Marriage
- Is a privately Fostered Child

We follow the South Gloucestershire early help process which includes the use of the Early Help Assessment Plan (EHAP).

<http://sites.southglos.gov.uk/safeguarding/children/i-am-a-professional/single-assessment-framework-for-early-help/#:~:text=to%20use%20the-,Early%20Help%20Assessment%20and%20Plan,-in%20order%20to>

It may be appropriate for a member of school staff to initiate an EHAP and take on the role of Lead Professional, or become a member of a Team around the Child/Family (TAC/F) as part of the EHAP process. If this is the case, then the staff member should be supported by the DSL, for example, by being given time to write the EHAP and attend TAC/F meetings. All staff should have an understanding of the EHAP process and how they can contribute to it as and when appropriate.

At St Paul’s Catholic Primary School the DSL will, as necessary, refer concerns about a child or family to South Gloucestershire’s Social Care (via the Access and Response Team (ART), following the referral process as laid out by the South Gloucestershire Partnership Board. The DSL will provide as much information as possible enabling Social Services to consider all the evidence, including that it is possible children are being harmed in contexts outside of the home.

St Paul’s Catholic Primary school, will, as a relevant agency, be part of discussions with our South Gloucestershire safeguarding partners in agreeing the levels for the different types of assessment and services to be commissioned and delivered, as part of the local arrangements.

### **Infrastructure and Procedures**

The procedures for safeguarding children and young people will be in line with both the [South West Child Protection Procedures](#) and [South Gloucestershire Children’s Partnership](#)

### **Record Keeping**

At St Paul’s Catholic Primary School, all concerns, discussions and decisions made regarding safeguarding or child protection concerns of all pupils are recorded in writing. The information is kept confidential and stored securely. A separate file is kept for each child when a concern is raised and is cross referenced to other children in the family. Records must include:

- All Cause for Concern sheets
- A clear and comprehensive summary of concern
- Details of how the concern was followed up and resolved
- The action taken, decision reached and the outcome
- A summary document is kept of the frequency and type of concern

All staff will be trained in how to raise and record any concerns about a pupil.

### **Training**

Training will also include cyber security, specifically the filtering and monitoring of school IT devices and will make use of the Cyber Security Standards for Schools and Colleges.Gov.UK and also Cyber Security Training for school staff-NCSCGov.Uk

[Meeting digital and technology standards in schools and colleges - Cyber security standards for schools and colleges - Guidance - GOV.UK \(www.gov.uk\)](#)

[Cyber security training for school staff - NCSC.GOV.UK](#)

#### **Designated Safeguarding Lead (DSL) and Deputy Safeguarding Leads (DDSLs)**

The DSL and DDSLs will undergo training to level 3 Child Protection, including on Multi Agency Working every 2 years.

#### **Governors**

St Paul's Governing Body will ensure that all governors receive appropriate safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in our school are effective and support the delivery of a robust whole school approach to safeguarding. It is also expected that all governors will undertake South Gloucestershire safeguarding and child protection training for governors' course every two years.

#### **Safeguarding Lead Governor**

The appointed Safeguarding Lead Governor will undertake training on Induction and will also undertake annual South Gloucestershire training on the Roles and Responsibilities of the Safeguarding Governor as well as any safeguarding training offered by Clifton Diocese.

The appointed Safeguarding Lead Governor is also expected to keep themselves up to date by accessing weekly online briefings from Andrew Hall (Safeguarding Consultant). They should disseminate any outcomes from these briefings to the SLT and Governors as relevant.

#### **Staff and Volunteers**

All staff and Volunteers will receive Safeguarding training on induction and will receive an annual update and refresher training at the start of each academic year.

### Designated Safeguarding Leads: Roles and Responsibilities

#### DESIGNATED MEMBER OF STAFF

1. The designated senior member of staff (designated person) for child protection in this school is:

**Mrs Maxine Sewell, Head Teacher\***

2. In her absence, these matters will be dealt with by:

**Claire Rogers, Deputy Head Teacher**  
or  
**Laura Holbrook, Humanities Lead**

#### **\*Any allegation of abuse by the Head Teacher must be reported immediately to the Chair of Governors**

3. The designated person is key to ensuring that proper procedures and policies are in place and are followed with regard to child safeguarding issues, including cyber security and the safety of the school's IT devices via appropriate filtering and monitoring. They will also act as a dedicated resource available for other staff, volunteers and governors to draw upon.
4. The school recognises that
  - The designated person must have the status and authority within the school management structure to carry out the duties of the post – they must therefore be a senior member of staff in the school.
  - All members of staff (including Supply Teachers and volunteers) must be made aware of who this person is and what their role is.
  - The designated person will act as a source of advice and coordinate action within the school over child protection cases
  - The designated person will need to liaise with other agencies, including South Gloucestershire Children's Partnership (SGCP) and build good working relationships with colleagues from these agencies in line with Working Together to Safeguard Children
  - They should possess skills in recognising and dealing with child welfare concerns
  - Appropriate training and support should be given
  - The designated person is the first person to whom members of staff report concerns
  - The designated person is responsible for referring cases of suspected abuse or allegations to the relevant investigating agencies according to the procedures established by SGSCB
  - In cases of alleged abuse carried out by a member of staff (including Supply Staff and Volunteers) or governors, the Designated Lead must report the allegation, immediately to the Local Authority Designated Officer (LADO)
  - The designated person is not responsible for dealing with allegations made against members of staff
  - Pupils may share concerns about other pupils' welfare and pupils will be encouraged and supported to share these concerns appropriately
5. To be effective the DSL and Deputy DSLs will:
  - Act as a source of advice, support and expertise within the school and be responsible for coordinating action regarding referrals by liaising with Children's Social care and other relevant agencies over suspicions that a child may be suffering harm

- Cascade safeguarding advice and guidance issued by South Gloucestershire Children’s Partnership. Where they have concerns that a referral has not been dealt with in accordance with the child protection procedures, refer to the Business Manager of SGCP to investigate further
- Use the NPCC – “When to call the police” link above to understand when they should consider calling the police and what to expect when they do
- Ensure each member of staff, Supply Staff, PPA Sports Staff and volunteer at the school, as well as regular visitors (such as Education Welfare Officers, Connexions personal advisors and trainee teachers) are aware of and can access readily, this policy
- Liaise with the Head Teacher (if the designated safeguarding lead is not the Head Teacher) to inform them of any issues and ongoing investigations and ensure there is always cover for the role
- Ensure that this policy is updated and reviewed annually and work with the designated governor for child protection regarding this
- Be able to keep detailed accurate secure written records of referrals/concerns and ensure that these are held in a secure place away from other pupil files
- Ensure parents are aware of the Child Protection and Safeguarding policy in order to alert them to the fact that the school may need to make referrals. Raising parents’ awareness may avoid later conflict if the school does have to take appropriate action to safeguard a child
- Where children leave the school roll, ensure any child protection file is transferred to the new school as soon as possible, separately from the main file, and addressed to the designated person for child protection
- Where a child leaves and the new school is not known, ensure that the local authority is alerted so that the child’s name can be included on the database for missing pupils
- Ensure, in liaison with the school IT Lead, that the schools IT devices are securely protected by secure filtering and monitoring systems, report any breaches and take appropriate steps to ensure the safety and wellbeing of any pupils involved in such breaches

The designated person also has an important role in ensuring all staff and volunteers receive appropriate training. They should:

- Attend training in how to identify abuse and exploitation and know when it is appropriate to refer a case
- Have a working knowledge of how South Gloucestershire Safeguarding Children Board operates and the conduct of a child protection case conference and be able to attend and contribute to these when required
- Attend any relevant or refresher training courses and then ensure that any new or key messages are passed to other staff, volunteers and governors
- Make themselves (and any deputies) known to all staff, volunteers and governors (including new starters and supply teachers) and ensure those members of staff have had training in child protection. This should be relevant to their needs to enable them to identify and report any concerns to the designated teacher immediately

## 6. Managing Referrals

The Designated Safeguarding Lead and the two Deputy Safeguarding Leads are expected to refer cases:

- Of suspected abuse and neglect to the South Gloucestershire’s Children’s Social Care as required and to support staff who make referrals
- To the Channel programme (prevent Referral) where there is a radicalisation concern as required and to support staff who report their concerns
- Where a member of staff is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required and

- Where a crime may have been committed to the Police as required <https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/2020/when-to-call-the-police--guidance-for-schools-and-colleges.pdf>

**DESIGNATED GOVERNORS:** Roles and Responsibilities

The Designated Governor for Child Protection at this school is:

<b>Carol Lawler</b>
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At St Paul's Catholic Primary School, governors ensure the focus of the school's work is on "Raising God's Children to Distinction" and this puts the wellbeing and welfare of each child at the heart of what we do. Therefore, safeguarding and child protection is at the forefront of our approach to education, underpins all aspects of our mission and is reflected in our processes, policies and systems.

We want our pupils to know that they are safe in our school and that staff will take their concerns seriously, they will be treated seriously, that we will listen to what they have to say and how they want to be treated - always ensuring they are safe and supported.

Child protection is important. Where appropriate, the governors will ensure that sufficient resources are made available to enable the necessary tasks to be carried out properly under inter-agency procedures.

The governors will ensure that the designated members of staff for Child Protection are given sufficient time to carry out their duties, including accessing training.

The governors will review safeguarding practices in the school on a regular basis, and no less than annually, to ensure that:

- The school is carrying out its duties to safeguard the welfare of children at the school, including effective filtering and monitoring systems to ensure the cyber security of the school's IT devices
- Ensure the school has effective policies which safeguard, promote and protect children's wellbeing, these policies include but are not limited to:
  - Acceptable Use Agreements for Pupils, Staff and Governors and Volunteers
  - Anti-Bullying Policy
  - Behaviour Policy
  - Child Protection and Safeguarding Policy (including Peer-on-Peer Abuse and Prevent)
  - Health and Safety and First Aid Policy
  - Medical Needs Policy
  - On-Line Safety Policy (E-Safety)
  - Special Educational Needs & Disability Policy
  - Staff Code of Conduct
  - Safer Recruitment Policy
  - Whistle Blowing
- Members of staff and volunteers are aware of current practices in this matter, and that staff receive training where appropriate
- They attend training on Child Protection/Safeguarding training for governors
- Child Protection is integrated with induction procedures for Supply Staff, all new members of staff and volunteers
- The school follows the procedures agreed by South Gloucestershire Safeguarding Children Board, and any supplementary guidance issued by the Local Authority

- Only persons suitable to work with children shall be employed in the school, or work here in a voluntary capacity
- Where safeguarding concerns about a member of staff are substantiated, take appropriate disciplinary action
- Governors ensure that arrangements to protect children and learners meet statutory requirements, promote their welfare and prevent radicalisation and extremism
- The school's governing body will each be DBS checked at enhanced level, those engaging in regulated activity will also be checked against the Barred List. They are also asked to disclose any relevant circumstances with regards to the laws relating to Disqualification under the Childcare Act 2006 (updated 31<sup>st</sup> August 2018).
- From September 2018, all newly appointed governors will be checked regarding Section 128 and an annual re-check carried out on all members of the FGB, including staff governors.

#### **SAFER RECRUITMENT (Please also refer to Safer Recruitment Policy)**

In order to ensure that children are protected whilst at this school, we will ensure that our staff and volunteers are carefully selected, screened, trained and supervised.

We accept that it is our responsibility to follow the guidance set out in part 3 of KCSiE 2023 (Safer Recruitment) and "Safeguarding Children and Safer Recruitment in Education" <https://www.gov.uk/government/publications/safeguarding-children-and-safer-recruitment-in-education/safeguarding-children-and-safer-recruitment-in-education>, in particular:

- Before appointing someone, follow up each reference with a telephone call or personal contact during which we will discuss the applicant's suitability to work with all children
- Check that all adults with substantial access to children at this school have an enhanced DBS check before starting work, and prior to confirmation of appointment (see Appendix 4 – flowchart)
- Ensure we check the candidate's identity – preferably by viewing their birth certificate and any legal documentation proving a change of name
- Ensure all shortlisted candidates complete a self-declaration form of their criminal record or of any information that would make them unsuitable to work with children. The purpose of this information is to enable a discussion of any relevant information before the DBS is requested
- The school will carry out an online search for each shortlisted candidate, this will be carried out by a designated senior member of staff who will report any concerns to the Head Teacher who will decide if these need to be shared with the rest of the interview panel and the candidate asked to elaborate on any findings. The school will inform shortlisted candidates that an online search may be carried out when inviting them for interview.

We will ensure that at least one member of any interview panel has completed certified NCTL Safer Recruitment Training.

In addition, we will ensure that the following checks are satisfactorily completed before a person takes up a position in the school:

- Identity checks to establish that applicants are who they claim to be<sup>2</sup>
- Academic qualifications, to ensure that qualifications are genuine
- Professional and character references prior to offering employment
- Satisfy conditions as to health and physical capacity
- Previous employment history will be examined and any gaps accounted for

<sup>2</sup> By viewing their birth certificate, passport or photo-based driving licence.

### **Disqualification by Association**

During the recruitment process, candidates are made aware of the need to disclose accurately any information that may prevent them from taking up the position at the school.

The Childcare Act 2006 (amended 2018) has deemed that it is no longer necessary to ask school staff if they are aware of any circumstances relating to disqualification by association and therefore any question relating to this will be removed from the interview process.

However, the amended act does still require schools to ask all staff if they know of any criminal charges or pending charges or reasons/information that may prevent them from taking up the position at the school. This will be done at interview and all staff asked annually.

**For colleagues already in post:** The Childcare Act 2006 (amended 2018) has deemed that it is no longer necessary to ask school staff if they are aware of any circumstances relating to disqualification by association and therefore staff in post will no longer be asked this question.

### **SUPPLY TEACHERS**

If an allegation is made against a Supply Teacher working/who has worked in St Paul's Catholic Primary School, the DSL and Safeguarding Governor will ensure that the allegation is dealt with fully, legally and professionally. Although Supply Teachers are employed by their Agency they are under the supervision, direction and control of St Paul's Catholic Primary School Governing Body when working in our school.

Under no circumstances will St Paul's Catholic Primary School decide to cease to use a Supply Teacher due to safeguarding concerns without finding out the facts and liaising with the Local Authority Designated Officer (LADO) in order to determine a suitable outcome to any concerns or allegations.

When an allegation against a Supply Teacher is received the DSL will immediately inform the Supply Agency and LADO to ensure they are aware of the allegation and to determine a suitable process. The DSL will discuss with the agency whether it is appropriate to suspend the Supply Teacher or redeploy them to another school, whilst the school takes the lead in the investigation. The school will need to take the lead in any investigation as the agency will not have direct access to the children or school staff, or the relevant information that will be required by the LADO as part of the referral process.

The Supply Teacher should be advised to contact their trade union representative, if they have one, or to contact another colleague for support.

As with allegations against school employed staff the LADO will take the lead in any investigation and it is expected that the Agency will be fully involved in this investigation and expected to fully share any information they hold regarding any previous concerns or allegations about the Supply Teacher and taken into account during the investigation.

St Paul's Catholic Primary School will ensure that all of its supply agencies are aware of this Child Protection and Safeguarding Policy and of our process for managing allegations, which will include inviting the agency's human resource/personnel manager to all meetings relating to the allegation.

### **GOVERNORS**

All governors – including elected staff governors and associate members will undergo a Section 128 check to ensure they are not disbarred from becoming governors. A Section 128 direction prohibits or restricts an unsuitable individual from participating in the management of a school.

### **VOLUNTEERS**

We understand that some people otherwise unsuitable for working with children may use volunteering to gain access to children; for this reason, any volunteers in the school, in whatever capacity, will be given the same consideration as paid staff.

Where a parent or other volunteer helps on a one-off basis, they will only work under the direct supervision of a member of staff, and at no time have one-to-one contact with children. However, if a parent or other volunteer is to be in school regularly or over a longer period then they will be subject to the DBS check to ensure their suitability to work with children. They will no longer be asked to disclose any relevant circumstances with regards to the laws relating to Disqualification by Association, see amended Childcare Act 2006 (amended 2018), but will be asked any relevant questions concerning the laws relating to Disqualification under the Childcare Act 2006 (updated 31<sup>st</sup> August 2018).

### **INDUCTION & TRAINING**

Staff will attend refresher training annually and the DSL and DSL's every two years.

All new members of staff will receive induction training, which will give an overview of the organisation and ensure they know its purpose, values, services and structure, as well as identifying and reporting abuse and exploitation, and confidentiality issues and providing them with all policies relevant to Safeguarding and Child protection –

- The Child Protection and Safeguarding Policy,
- The Staff Code of Conduct
- The Acceptable Use Policy
- The Behaviour Policy
- The Anti Bullying Policy
- The Online Safety Policy
- The Whistle Blowing Policy
- The Medical Needs Policy
- The Asthma Policy
- The Health & Safety and First Aid Policy

Supply Teaching Agencies will be given a copy of this Child Protection and Safeguarding Policy and will be informed of our process for managing allegations against staff, including supply teachers. Supply Teachers working at St Paul's Catholic Primary School will be given their own copy of this policy and given an induction, covering Safeguarding and Health and Safety.

All new staff at the school (including volunteers) will receive basic Child Protection information and a copy of this policy within one week of starting their work at the school. They will be asked to sign a log to indicate they have received and read and understood the documents including Keeping Children Safe in Education SECTION 1, the Safeguarding and Child Protection Policy, Staff Code of Conduct and be made aware of the "What to do if a child is being abused" (2018). This training log will be kept in the staff room. Individual training records are kept in staff personnel folders. A Safeguarding Training Record will be kept by the school administrator and monitored by the Safeguarding Governor, at least three times a year.

Existing staff will be asked to read any updates to the documents as they occur and sign a log to say they have done so.

All staff will be expected to attend training on safeguarding children that will enable them to fulfil their responsibilities in respect of Child Protection effectively. The school will provide this training in-house, on-line or by a nationally accredited external provider.

Staff have an understanding of when to make referrals when there are issues concerning sexual exploitation,



radicalisation and/or extremism or they will seek additional advice and support from the designated person in the first instance.

The teaching staff will meet to discuss 'at-risk' children at least three times a year. This session will highlight any children and ensure appropriate confidential information sharing.

### DEALING WITH CONCERNS

Members of staff (including Supply Teachers) and volunteers are not required by this school to investigate suspicions. If somebody believes that a child may be suffering, or may be at risk of suffering significant harm, they must always refer such concerns to the Designated Safeguarding Lead or their Deputies, who will refer the matter to the appropriate department of the Local Authority Designated Officer (LADO).

To this end, volunteers and staff (including Supply Teachers) who:

- Upon the receipt of any information from a child, or if any person has suspicions that a child may be at risk of harm, or
- If anyone observes injuries that appear to be non-accidental, or
- Where a child or young person makes a direct allegation or implies that they have been abused, exploited or
- Makes an allegation against a member of staff<sup>3</sup>

Must follow the procedures below (also outlined in appendix 4):

They must record promptly in writing all concerns, including verbal conversations, i.e. what they have seen, heard or know accurately at the time the event occurs, and share their concerns with the Designated Safeguarding Lead (or Chair of Governors if an allegation about the Head Teacher) and agree action to take. Any written record must be signed and dated. Records of individual cases are kept confidential in a secure place in the Head Teacher's office.

We will ensure that all members of staff and employees are familiar with the procedures for keeping a confidential written record of any incidents and with the requirements of South Gloucestershire's Safeguarding Commission.

Where any member of staff fails to report their concerns, this may be dealt with as a disciplinary matter.

### SAFEGUARDING IN SCHOOL

As well as ensuring that we address child protection concerns, we will also ensure that children who attend the school are kept safe from harm whilst they are in our charge. Through our teaching and appropriate curriculum areas, we will ensure that our children will be taught about Safeguarding, how to recognise when they are at risk and how to ask for help when they need it.

To this end, this policy must be seen in light of the school's policies and/or procedures on:

- **Whistle Blowing** – it is the duty of everyone to report any concerns they have regarding Safeguarding immediately. If the reporting person feels the school is not responding appropriately, they must follow the Whistleblowing Policy and report their concerns immediately to the appropriate authority.
- **Personal, Social and Health Education and Sex and Relationships Education**; child protection issues will be addressed through the curriculum as appropriate and as required by the mandatory Relation and Sex and Health education curriculum (Sept 2020)
- **E-Safe (Online Safety), IT Security, Social Media**

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<sup>3</sup> Allegation that the member of staff has harmed a child, committed an offence against a child, or behaved in a way that questions their suitability to work with children.

- **Medical Needs**
- **Anti-Bullying;** the school will also ensure that bullying is identified and dealt with so that any harm caused by other pupils can be minimised. We will pay particular attention to sexualized behaviour, inappropriate use of social media or bullying that is homophobic in nature, radicalisation and extremism or where there appears to be links to domestic abuse in the family home.
- **Safer Recruitment**
- **Code of conduct for staff**
- **Racist incidents**
- **Confidentiality**
- **Behaviour and the school rules**
- **Health & Safety, First Aid & Wellbeing**
- **Physical Intervention**
- **Allegations against members of staff**
- **Attendance Policy and Children Missing Education.**

Any member of staff, volunteer or governor seeking additional information or advice on any of the above should refer directly to the Head Teacher, or in their absence the Deputy Head Teacher. All policies can be found on the staff hard drive in the Staff Safeguarding folder.

#### **PHOTOGRAPHING CHILDREN**

We understand that parents like to take photographs or video record their children in the school play, at sports day, or school presentations. This is a normal part of family life and we will not discourage parents from celebrating their child's successes. We will, however, explain to parents/carers/relatives that these photographs are for their personal use only and that under no circumstances should these images be posted on social media platforms as they may well include images of other children.

However, if there are Health and Safety issues associated with this, i.e. the use of a flash when taking photos could distract or dazzle the child and cause them to have an accident, we will encourage parents to use settings on their camera that do not require flash.

We will not allow others to photograph or film pupils during a school activity without the parents' permission.

We will not allow images of pupils to be used on school websites, publicity, or press releases, without express permission from their parents, and if we do obtain such permission, we will not identify individual children by name.

The school cannot, however, be held accountable for photographs or video footage taken by parents or members of the public at school functions.

**ONLINE SAFETY (E-Safety)** please also refer to the Schools' E Safety, IT and Social Media Policies.

St. Paul's Catholic Primary School provides an education that realises the full potential of each individual child in accordance with Gospel Values and the teaching of our faith. In our school we feel the attainment of good ICT skills is intrinsic in reaching this potential and therefore e-safety is a paramount concern. New technologies have become integral to the lives of children and young people in today's society, both within schools and in their lives outside school.

The internet and other digital and information technologies are powerful tools, which open up new opportunities for everyone. Electronic communication helps teachers and pupils learn from each other. These technologies can stimulate discussion, promote creativity and increase awareness of context to promote effective learning. Children and young people should have an entitlement to safe internet access at all times.

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

- Content – being exposed to illegal, inappropriate or harmful content
- Contact – being subject to harmful interaction with other users
- Conduct - exhibiting inappropriate personal online behaviour that increases the likelihood or causes harm, both to themselves or towards others, and
- Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

The requirement to ensure that children and young people are able to use the internet and related communications technologies appropriately and safely is addressed as part of the wider duty of care to which all who work in schools are bound. At St Paul's Catholic Primary School this is covered by our IT curriculum and by our E Safety and acceptable use Policies.

To ensure the online safety of pupils working online from school premises, the school has ensured that appropriate filters and monitoring systems are in place by using South Gloucestershire IT Services via the LA trading company Integra.

Remote learning may occur in the form of homework and in relation to any necessary contingency plans. Therefore, St Pauls Catholic Primary School will refer to and be guided by the DfE guidance: Safeguarding in Schools and Colleges and Safeguarding and Remote Education as well as other supportive publications such as those issued by the NSPCC and PSHE Association.

Commented [SH4]: PSHE

St Paul's School aims to be in regular contact with parents and carers in order to reinforce the importance of children being safe online and to explain as appropriate what the systems we use to filter and monitor online use. We will also share with parents and carers what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school (if anyone) their child is going to be interacting with online.

Year Five and Six Pupils, at the request of parents, are permitted to bring mobile phones into school to facilitate their safety to and from school. When entering school all pupils must take their phones to the school office, where they are stored securely throughout the day. Pupils then collect their phone at the end of the school day, as they leave the building.

### **Filters & Monitoring**

Whilst understanding that children need to be proficient in using IT to support and enhance their learning and to use IT responsibly so they are prepared for modern life the Governors are aware of their responsibility to safeguard and promote the welfare of the children and provide them with a safe environment in which to learn, therefore we will do all we reasonably can to limit children's exposure to risks from the school's IT system. As part of this process, we ensure St Paul's Catholic Primary School has appropriate filters and monitoring systems in place as provided by Integra IT Services and regularly review their effectiveness. An annual report is received from Integra and filtering and monitoring is overseen by the IT Lead and DSL. The Senior Leadership Team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

### **CONFIDENTIALITY & DATA PROTECTION**

The school, and all members of staff at the school, will ensure that all data about pupils is handled in accordance with the requirements of the law, and any national and local guidance.

Any member of staff who has access to sensitive information about a child or the child's family must take all reasonable steps to ensure that such information is only disclosed to those people who need to know.

Regardless of the duty of confidentiality, if any member of staff has reason to believe that a child may be suffering harm, or be at risk of harm, their duty is to forward this information without delay to the designated member of staff for Child Protection.

St Paul's Catholic Primary School recognises that information sharing is vital in identifying and tackling all forms of abuse and exploitation and in promoting children's welfare, including their educational outcomes and understand that schools have clear powers to share, hold and use information for these purposes and this is reflected within our practice.

The Governors and School are aware of our duties to process information fairly and lawfully and to keep all information held securely and safely. (See the Information Commissioners Office (ICO) guidance) <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/>

St Paul's Governing Body will ensure, via this policy, that staff have due regard to the relevant data protection principles which allows them to share (and withhold) personal information as provided for in the Data Protection Act, 2018 and the UK General Data Protection Act GDPR.

The Data Protection Act, May 2018 and UK General Data Protection Act GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. This includes allowing practitioners to share information without consent. Keeping Children Safe in Education 2019, paragraph 78. For more details regarding Safeguarding and GDPR, see pages 82 - 88 in Keeping Children Safe in Education 2020, Part 2. This includes a link to "Data Protection: Toolkit for schools" which is guidance to support schools with data protection activity, including compliance with the GDPR, May 2018.

#### **CONDUCT OF STAFF**

The school has a duty to ensure that professional behaviour applies to relationships between staff and children, and that all members of staff are clear about what constitutes appropriate behaviour and professional boundaries.

At all times, members of staff are required to work in a professional way with children. All staff should be aware of the dangers inherent in:

- Working alone with a child
- Physical interventions
- Cultural and gender stereotyping
- Dealing with sensitive information
- Giving to and receiving gifts from children and parents
- Contacting children through private telephones (including texting), e-mail, MSN, Chat Forums and shared servers or social networking websites
- Disclosing personal details inappropriately
- Meeting pupils outside school hours or school duties

If any member of staff has reasonable suspicion that a child is suffering harm and fails to act in accordance with this policy and South Gloucestershire Safeguarding Board procedures, we will view this as misconduct, and take appropriate action.

## PHYSICAL CONTACT & POSITIVE HANDLING

Members of staff may have to make physical interventions with children. Members of staff should only do this where:

- It is necessary to protect the child, or another person, from immediate danger, or
- Where the member of staff has received suitable training

## ALLEGATIONS AGAINST MEMBERS OF STAFF

### ALLEGATIONS THAT MAY MEET THE HARM THRESHOLD

If anyone makes an allegation that any member of staff (including any Supply Teacher, volunteer or governor) may have behaved in such a way that the allegation has met the Harm Threshold as outlined below:

- Committed an offence against a child
- Placed a child at risk of significant harm
- Behaved in a way that calls into question their suitability to work with children
- Behaved or may behave in a way that indicates they may not be suitable to work with children (transferable risk) including any such behaviour that occurs outside of the school
- Given any cause for thinking they have met the criteria of the "Harm Test" as set out on the Disclosure and Disbarring Service Website – GOV.UK

**Then the allegation will be dealt with in accordance with national guidance and agreements, as implemented locally by South Gloucestershire Safeguarding Commission.**

The Head Teacher, rather than the designated member of staff, will handle such allegations unless the allegation is against the Head Teacher, when the Chair of Governors will handle the school's response.

The Head Teacher (or Chair of Governors) will gather information about the allegation, and report these without delay to the Local Authority, through the Local Authority Designated Officer (LADO). Where the allegation is about a Supply Teacher, the supplying agency will also be immediately informed by the Head Teacher (or Chair of Governors) and the LADO informed.

After the outcome of the investigation, should the allegation be upheld and the person in a regulated activity been dismissed or removed due to safeguarding concerns (or would have been if they had not resigned) the DSL will ensure a referral is immediately made to the Disclosure and Disbarring Service (DBS).

**This is a legal duty and failure to refer when the criteria is met is a criminal offence.**

**LOW LEVEL CONCERNS:** concerns that do not meet the harm threshold

At St Paul's Catholic Primary School we aim to create an open and transparent culture in which all concerns about all adults working in or on behalf of the school are dealt with promptly. We are aware that concerns about an adult (school staff, volunteer, governor, supply teacher, contractor) may arise that do not meet the Harm Threshold but nevertheless are not insignificant and cause a nagging doubt or sense of unease. For instance, the adult may have acted in a way that:

- Is inconsistent with the school's Staff Code of Conduct, including inappropriate conduct out of school
- Does not meet the allegations threshold or is otherwise not considered serious enough to be referred to/actioned by to the LADO, but does incur a sense of concern or unease, for instance:
  - Being overfriendly with children
  - Having favourites
  - Taking photographs of children on personal mobile equipment

- Engaging in one-to-one work with a pupil in a secluded area or behind a closed door
- Using inappropriate language (sexualised, intimidating, offensive)

Staff will be encouraged to report all such concerns/worries regarding such behaviour to the DSL (or Chair of Governors, if it is about the Head Teacher), and these will be recorded (including details of concern, context of concern) and investigated and then action taken where necessary with outcomes recorded.

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

If the DSL is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they should consult with South Gloucestershire LADO.

### **BEFORE AND AFTER SCHOOL ACTIVITIES**

Where the Governing Body transfers control of use of school premises to bodies (such as sports clubs) to provide out of school hours activities, we will ensure that these bodies have appropriate Safeguarding and Child Protection policies and procedures, and that there are arrangements in place to link with the school on such matters. Such considerations will be made explicit in any contract or service level agreement with the bodies. The Letting Policy requires the hirer to provide a copy of their safeguarding policy which must reflect KCSiE 2024 and the non-statutory guidance Keeping Children Safe during Community Activities, After School Clubs and tuition. The letting will only be approved when this policy has been received.

### **USE OF SCHOOL PREMISES BY OUT OF SCHOOL SETTINGS**

The Governing Body will ensure that when we rent or hire the school premises to organisations or individuals that should the hirer be providing activities for children, that the hirer has appropriate arrangements for keeping the children safe, including an up to date Child Protection Policy which references KCSiE 2024 and that all appropriate safeguarding checks have been carried out on staff and volunteers working with the children. These requirements will be clearly reflected in our Lettings Policy and Letting Agreement. Should the hirer not be able to provide these documents and evidence appropriate checks have been carried out then the hire or let will be terminated. Governors will use the DfE document Keeping Children Safe in Out of School Settings to determine the safeguarding arrangements that we should expect the hirer to have in place. [Keeping children safe during community activities, after-school clubs and tuition: non-statutory guidance for providers running out-of-school settings - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/keeping-children-safe-during-community-activities-after-school-clubs-and-tuition-non-statutory-guidance-for-providers-running-out-of-school-settings)

If the School receives an allegation relating to an incident that happened when an individual or organisation were hiring our school premises for the purpose of running activities for children, St Paul's school will follow this safeguarding policy and procedures and including informing the LADO.

### **CONTRACTED SERVICES**

Where the Governing Body contracts its services to outside providers, we will ensure that these providers have appropriate Safeguarding and Child Protection policies and procedures, and that there are arrangements in place to link with the school on such matters. Such considerations will be made explicit in any contract or service level agreement with the provider.

### **EVALUATION AND REVIEW**

This policy will be reviewed by Head Teacher and Safeguarding Governor at least annually and will be aligned with each current Keeping Children Safe in Education. It may be amended before the annual review should

it become clear that events within or without of our school indicate a policy change is necessary. It will go to all staff for consultation before being presented to the Full Governing Body for Approval.

Approved by the FGB on the 15<sup>th</sup> October 2024

Next Review: September 2025

Signed: \_\_\_\_\_  
**Chair of Governors**

\_\_\_\_\_  
**Head Teacher**

**Date:**

**Date:**



## Definitions

### Child Sexual Exploitation

The Statutory Guidance on Safeguarding Children and Young People from Child Sexual Exploitation Feb 2017 defines Child Sexual Exploitation as:

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

### County Lines Exploitation

County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons; and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and VCS (voluntary and community sector) organisations.

The UK Government defines county lines as:

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations, including schools. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as "plugging", where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims and their families if they attempt to leave the county lines network.

One of the ways of identifying potential in county lines are missing episodes (from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a Referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of, or involved, in county lines a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

County lines activity and the associated violence, drug dealing and exploitation has a devastating impact on young people, vulnerable adults and local communities.

### Child Criminal Exploitation

Child criminal exploitation is increasingly used to describe this type of exploitation where children are involved, and is defined as:

Child Criminal Exploitation is common in county lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual.



Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology.

Criminal exploitation of children is broader than just county lines, and includes, for instance, children forced to work on cannabis farms or to commit theft.

### **Domestic Violence**

Domestic abuse (where children see, hear or experience its effects) can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, exploitation, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

### **Female Genital Mutilation**

“Female Genital Mutilation (sometimes referred to as female circumcision) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.” (NHS Choices)

Female Genital mutilation is a **mandatory reporting duty** and requires regulated health and social care professionals and teachers in England and Wales **to immediately and personally report** known cases of **FGM** in under 18-year-olds to the police.

### **The Prevent Duty**

**The Prevent duty** is the **duty** in the Counter-Terrorism and Security Act 2015 on specified authorities, in the exercise of their functions, to have due regard to the need to **prevent** people from being drawn into terrorism. We positively promote British Values, which underpin the main ethos and ‘city of values’ of our school.

### **Grooming by a Professional**

Grooming is when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse, sexual exploitation or trafficking

Children and young people can be groomed online or face-to-face, by a stranger or by someone they know - for example a family member, friend or professional. We regard anyone employed by the school to be a professional.

Groomers may be male or female, they may be any age. Grooming happens both online and in person. Groomers will hide their true intentions and may spend a long time gaining a child's trust. Groomers may try to gain the trust of a whole family to allow them to be left alone with a child and if they work with children they may use similar tactics with their colleagues. Groomers do this by:

- Pretending to be someone they are not, for example saying they are the same age online
- Offering advice or understanding
- Buying gifts
- Giving the child attention
- Using their professional position or reputation
- Taking them on trips, outings or holidays

### **Breast Ironing**

Breast ironing is practised in some African countries, notably Cameroon. Girls aged between nine and fifteen have hot pestles, stones or other implements ribbed on their breast to stop them developing further. This is mostly carried out by mothers or grandmothers (the men in the family are unaware) and is seen as a protection for the girls by making them seen “childlike” for longer and to reduce the likelihood of pregnancy, sexual harassment, rape, forced marriage and kidnapping. It is a form of physical abuse. It does not stop the breasts from growing but can slow development. It can cause malformed breasts, difficulty in breast feeding or producing milk, severe pain, infections and abscesses.

Concerns have been raised that breast ironing is also to be found amongst African Communities in the UK, with as many as 1,000 girls at risk. It is mentioned in the document “Keeping Children Safe in Education” on page 54 as part of the section on Honour Violence.

### **Serious Violence**

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

### **Up Skirting**

The Voyeurism (offences) Act, which is commonly known as the Upskirting Act, came into force on 12<sup>th</sup> April 2019. “Upskirting” is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender can be a victim.



## Appendix 1

### Forms of Abuse: Signs and Symptoms

There are four main types of abuse. Abuse can be physical, sexual or emotional, it also includes exploitation of the child in any form. It can also take the form of neglectful behaviour towards a child.

#### **Physical abuse**

Physical abuse may involve:

- Hitting
- Shaking
- Throwing
- Drowning
- Burning or scalding
- Poisoning
- Suffocating
- Otherwise causing physical harm to a child

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**The following signs of abuse are not exhaustive and remember that a child may be experiencing more than one type of harm; for example, emotional abuse and neglect.**

Children regularly collect bumps and bruises in the course of their everyday play or social interaction, but it doesn't mean that they are being abused. All injuries need to be considered in the light of the age of the child, their stage of development, their social background, where injuries are on their body and any explanation given.

#### **Physical signs include:**

- Finger mark bruising on cheeks or any other area of the body where bruises are unlikely to appear in everyday play
- Presence of injuries that are in several stages of healing suggesting that a child has experienced repeated maltreatment over time
- Injuries to the soles of the feet
- Bald patches on a child's head
- Bite marks
- Injuries that form a shape or pattern
- Bruising to babies that are immobile because they are yet to reach the developmental milestone where they can sit without support, roll over, crawl or shuffle
- Scald marks and burning, including cigarette marks
- Black eyes
- Marks that might indicate a child has been restrained or strangled
- Broken bones
- Any injuries that are inconsistent with the explanation given

#### **Behavioural signs include:**

- Flinching when touched
- Inability to recall how injuries occurred
- Avoiding getting changed for sporting or other activity
- Reluctance to go home

- Wearing trousers and shirts or blouses with long sleeves even on hot sunny days, although remember to consider this in the light of the individual child (eg some children are dressed 'modestly for religious and/or cultural reasons)
- Excessively eager to please
- Very aggressive or withdrawn
- Attempts to run away
- Sad, frequently cries
- Drug and/or alcohol misuse
- Any behaviour that is not consistent with a child's stage of development

### **Sexual abuse and Exploitation**

Sexual abuse and/or exploitation can involve someone forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

In fact, the majority of children who are sexually abused by a carer will have no visible signs at all, due to the attacker not wanting to leave evidence, amongst many other reasons in the grooming process.

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

The activities may involve physical contact, including:

- Assault by penetration
- Non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. It may also include non-contact activities, such as:
  - watching sexual activities
  - encouraging children to behave in sexually inappropriate ways
  - involving children in looking at, or in the production of, sexual images
  - grooming a child in preparation for abuse and exploitation (including via the internet)
  - up skirting

#### **Physical signs include:**

- Stomach pains
- Genital soreness, bleeding or discharge
- Recurring genital-urinary infections
- Discomfort in walking or sitting
- Sexually transmitted infections

#### **Behavioural signs include:**

- A change in behaviour
- Not wanting to undress
- Sexual knowledge, language and behaviours beyond their age
- Eating disorders
- Fear or avoidance of being with a person or a group of people
- Withdrawn behaviour
- Self-harming
- Unexplained amounts of money
- Disturbed sleep
- Sexualised drawings
- Change in handwriting
- The types of questions asked (do they suggest sexual knowledge that a child should not have)

### **Emotional abuse**

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe adverse effects on the child's health and emotional development.

Some level of emotional abuse is involved in all types of maltreatment of a child, though it may also occur alone. Emotional abuse may involve:

- rejecting or ignoring a child completely
- using degrading language or behaviours towards them
- responding to their attempts to interact with emotional detachment
- making fun of them
- threatening them or encouraging them to develop behaviours that are self-destructive
- preventing the child from interacting socially with other children or adults
- a child seeing or hearing the ill treatment or serious bullying (including cyberbullying) of another
- causing children to feel frequently frightened or in danger
- the exploitation or corruption of children

Emotional abuse also includes radicalising a child or young person who may be subsequently drawn into terrorist-related activity.

**Physical signs include:**

- Self-harm marks
- Erratic weight or growth patterns
- Delayed development, either physically or emotionally
- Erratic behaviour

**Behavioural signs include:**

- Difficulty in forming relationships
- Inappropriate attention-seeking
- Withdrawn
- Unexplained underachievement at school
- Self-harming
- Bed-wetting
- Disturbed sleep

**Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing or 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
- Respond to a child's basic emotional needs

**Physical signs include:**

- Poor personal hygiene/unwashed clothing
- Inadequate clothing (not having warm clothes in winter)
- Lack of muscle tone (bones appearing to stick out)
- Lack of energy due to inadequate food intake and/or poor nutrition
- Untreated skin or hair problems (rashes, sores, flea bites, head lice)
- Unattended medical or dental problems
- Consistent hunger/big appetite - can't seem to eat enough
- Very thin or swollen stomach

**Behavioural signs include:**

- Difficulty in making friends
- Missing or irregularly attending school or nursery
- Anti-social behaviour
- Withdrawn
- Steals food or begs it from others
- Developmental delay (weight, language, social skills)
- Demands constant attention and affection
- Alcohol or substance misuse

**Female genital mutilation (FGM)**

This involves procedures that include the partial or total removal of the external female genital organs for cultural or other non-therapeutic reasons. The practice is medically unnecessary, extremely painful and has serious consequences, both at the time the mutilation is carried out and in later life. FGM is prevalent in 28 African countries as well as in parts of the Middle East and Asia. It has been estimated that over 20,000 girls under the age of 15 are at high risk of FGM in the UK each year and that 66,000 women in the UK are living with the consequences, although the true extent of the crime is unknown. The age at which girls may undergo FGM varies a great deal according to the community. The procedure may be carried out when a girl is new born, during childhood or adolescence, just before marriage or during the first pregnancy. However, the majority of cases are thought to take place between the ages of five and eight, and therefore girls within that age bracket are at a higher risk.

Although we have included this here, FGM is emotional and sexual abuse as well as physical abuse and is illegal in all four nations of the UK.

**Behavioural signs of FGM include:**

- Not turning up for health appointments
- Extended absence or the child goes to school, but absents themselves from lessons, possibly spending prolonged periods in the toilets
- Unable to disobey their parents
- Anxiety leading up to holidays (especially summer holidays as this is a time when families may take their child abroad for the procedure)
- Talk of a 'special ceremony' that is going to take place (although the girl may be unaware of what it is about)
- General anxiety, depression, emotional withdrawal
- Sudden decline in performance, aspiration or motivation
- Being withdrawn from education, sporting and social interaction, restricting their health and educational opportunities and personal development

Female Genital mutilation is a **mandatory reporting duty** and requires regulated health and social care professionals and teachers in England and Wales to **report** known cases of **FGM** in under 18-year-olds to the police.

**Child sexual exploitation**

Child sexual exploitation is illegal activity by people who have power over children and young people and use it to sexually abuse them. This can include seemingly consensual relationships or sexual activity in exchange for attention, a place to stay, gifts, money, cigarettes or illegal substances. It can also include serious organised crime.

**Behavioural signs of child sexual exploitation include:**

- Being absent from school

- Possessing unexplained gifts
- Having an older boyfriend or girlfriend
- Mood swings
- Alcohol and drug misuse
- Inappropriate sexualised behaviour

### **Criminal Exploitation of Children and County Lines**

Child criminal exploitation is increasingly used to describe this type of exploitation where children are involved, and is defined as:

Child Criminal Exploitation is common in county lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology.

Criminal exploitation of children is broader than just county lines, and includes for instance children forced to work on cannabis farms or to commit theft.

#### **Behavioural signs of criminal exploitation, including county lines include:**

- Persistently going missing from school or home and / or being found out-of-area;
- Unexplained acquisition of money, clothes, or mobile phones
- Excessive receipt of texts / phone calls and/or having multiple handsets
- Relationships with controlling / older individuals or groups
- Leaving home / care without explanation
- Suspicion of physical assault / unexplained injuries
- Parental concerns
- Carrying weapons
- Significant decline in school results / performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well-being

### **Forced marriage and honour-based abuse**

In forced marriage, one or both spouses do not or cannot consent to the marriage and duress is involved. This can include physical, sexual, financial and emotional pressure. If families have to resort to violence or emotional abuse to make someone marry, the person has not given consent freely and therefore it is a forced marriage.

Forced marriage is different to an arranged marriage, where the families of both prospective spouses take a leading role in arranging the marriage, but the choice of whether or not to accept the arrangement rests with both the people involved.

#### **Behavioural signs of forced marriage include:**

- Low self-esteem
- Anxiety, depression, emotionally withdrawn
- Absence from school or permission sought for extended leave

### **Honour-based Abuse**

This is a term used to describe violence (physical and/or emotional) committed within the context of the extended family which are motivated by a perceived need to restore standing within the community, which is presumed to have been lost through the behaviour of the victim.

## **Self-harm**

Self-harm is when somebody intentionally damages or injures their body. It's usually a way of coping with or expressing overwhelming emotional distress.

Sometimes when people self-harm, they feel on some level that they intend to die. Over half of people who die by suicide have a history of self-harm.

However, the intention is more often to punish themselves, express their distress or relieve unbearable tension. Sometimes the reason is a mixture of both.



## Appendix 2

### ST PAUL'S CATHOLIC PRIMARY SCHOOL



#### DESIGNATED PERSONS FOR CHILD Safeguarding

##### **DESIGNATED MEMBER OF STAFF**

The designated senior member of staff (designated person) for child safeguarding in this school is:

Maxine Sewell (Head Teacher)

In her absence, these matters will be dealt with by:

Claire Rogers (Deputy Head Teacher)  
Laura Holbrook (Humanities Lead)

##### **DESIGNATED GOVERNOR**

The Designated Governors for Child Safeguarding at this school are:

Mrs Carol Lawler  
[carol.lawler@stpaulscatholicprimary.co.uk](mailto:carol.lawler@stpaulscatholicprimary.co.uk)

##### **CHAIR OF GOVERNING BODY**

The Chair of Governors for academic year 2024- 2025 is

Mrs Carol Lawler  
Contact Details  
[carol.lawler@stpaulscatholicprimary.co.uk](mailto:carol.lawler@stpaulscatholicprimary.co.uk)

**REMEMBER SAFEGUARDING IS THE RESPONSIBILITY OF EVERY SINGLE ONE OF US – DON'T LEAVE IT TO SOMEONE ELSE AND REMEMBER IT IS NOT JUST ABOUT ABUSE BUT ALSO ABOUT POTENTIAL FOR HARM AND PROTECTING ALL CHILDREN IN OUR COMMUNITY**

For concerns outside of school, please refer to:  
LADO (Jon Goddard) 01454 868924  
or  
Action and Response Team (ART) 01454 866000

**Appendix 3**



**ST PAUL'S CATHOLIC PRIMARY SCHOOL**

**WHAT TO DO IF YOU HAVE ANY CONCERNS ABOUT A CHILD OR  
IF A CHILD DISCLOSES SOMETHING TO YOU**

**REASSURE THE CHILD**

- Make sure they know they have done the right thing and give them the message it is not their fault

**DO NOT MAKE A PROMISE NOT TO TELL ANYONE!**

- Always explain that if you think they may be hurt you have to tell someone so that they can help
- Remember do not question or put ideas/words in their mind use

**LITTLE TED**

- **TELL ME**
- **EXPLAIN TO ME**
- **DESCRIBE TO ME**

- Give the child time, if necessary, make brief notes but give them your time and attention and comfort
- When appropriate give the child back into the care of their teacher/someone familiar, do not break confidentiality, then **REPORT TO DESIGNATED PERSON IMMEDIATELY** (SEE POLICY ABOVE)
- Write up as far as you can on the cause for concern sheets – keeping to facts and what the child actually said – sign and time and date it and give to the Designated Safeguarding Lead
- **Get support for yourself**

**IF YOU HAVE CONCERNS BUT NO DISCLOSURE**

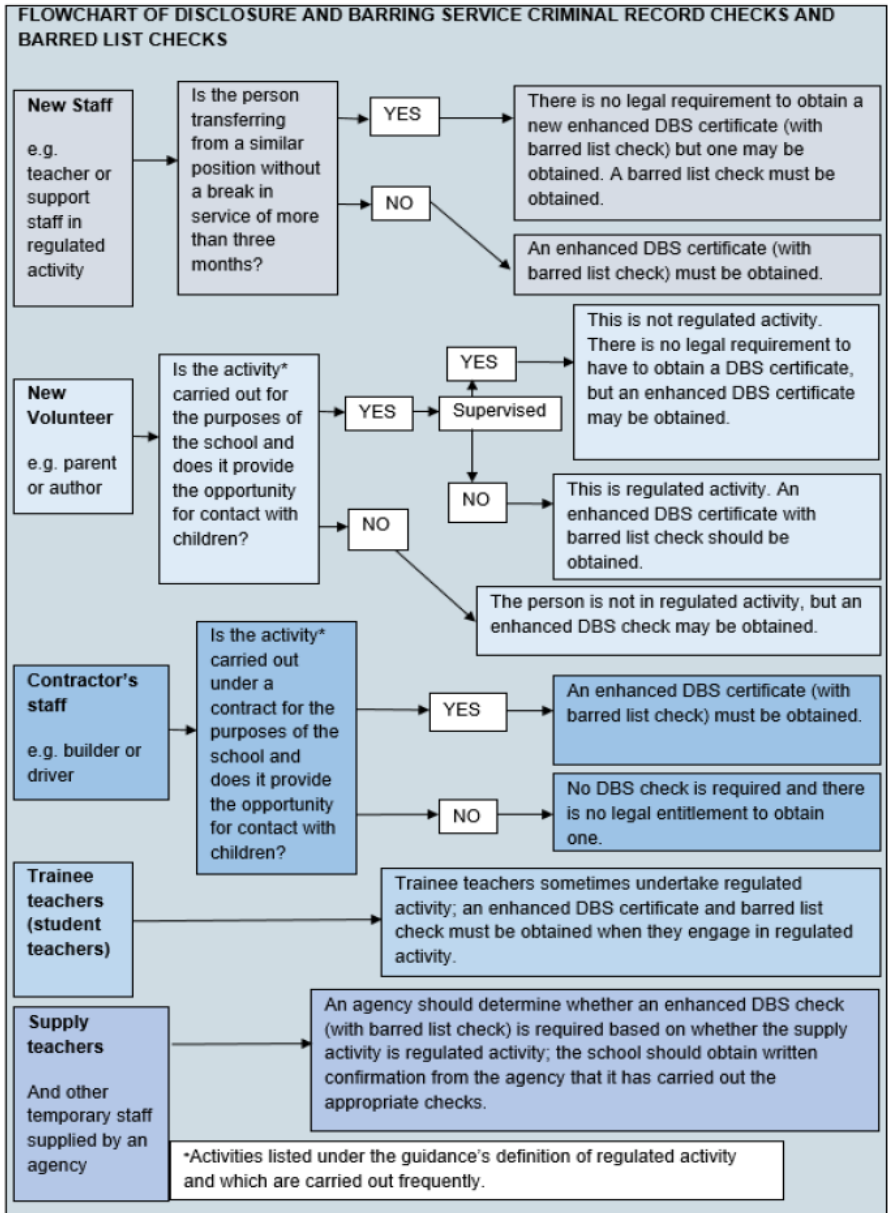
- **SHARE** – with the Designated Person
- Record concerns on the cause for concern sheets saying what your concerns are and what evidence (if any you have)
- **Get support for yourself**

**WHO TO TELL**

- **HEAD TEACHER (DSL)**
  - **IF HEAD IS ABSENT – DEPUTY HEAD (DDSL), PSHE LEAD (DDSL),**
- **IF CONCERN IS ABOUT THE HEAD – CHAIR OF GOVERNORS**

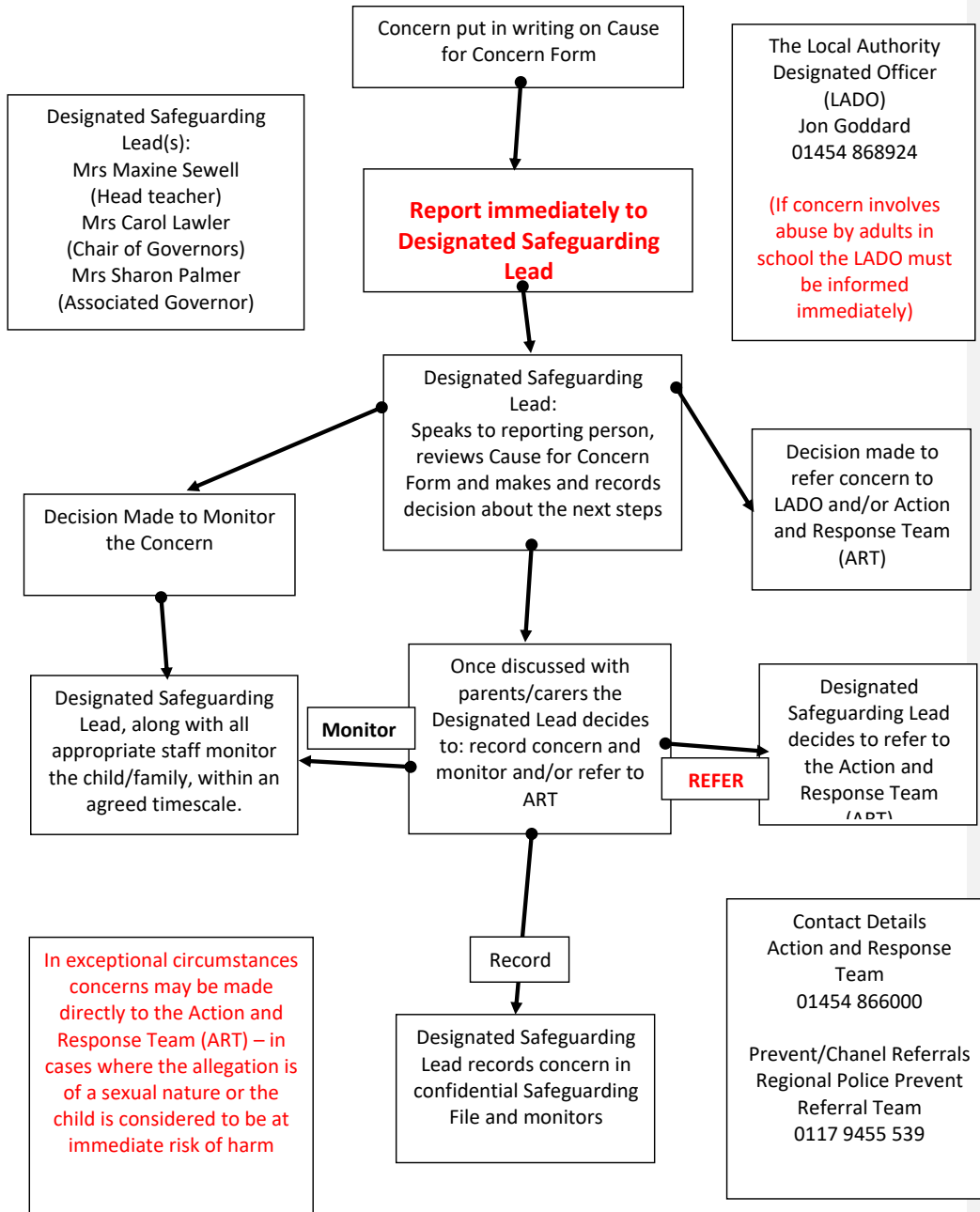
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Appendix 4



Appendix 5

FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD





**LADO Process flowchart**

**LADO THRESHOLD (Working Together to Safeguard Children 2018 & KCSiE 2021 & KCSiE 2023)**

- Behaved in a way that has harmed/may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children (Working Together to Safeguard Children 2018)
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

**YES / MAYBE**

**NO**

Information about the allegation and the employee including employment history and any previous concerns to be shared with LADO. Any immediate action needed to ensure the safety of children will be agreed

LADO will offer advice to assist the employer and HR deal with the concern. LADO will record the advice

LADO will arrange discussions or convene an Allegations Management meeting to exchange information, assess risk and agree on the investigation process which may include:

Employer and/HR investigation

Police led criminal investigation – police will keep LADO updated re progress of their investigation and the outcome

Employer feeds back to LADO the findings and actions from their investigation

On completion of the criminal investigation a further Allegations Management meeting/discussion may be held to share information with the Employer/HR to support any disciplinary hearing

Where an employee/volunteer is dismissed as a result of a safeguarding concern it is the employing organisation's responsibility to complete a DBS referral and refer to the professional/regulatory organisation