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FIDES et OPERA

BROMLEY
HIGH SCHOOL

GDST
GIRLS' DAY SCHOOL TRUST

Safeguarding & Child Protection Policy

This policy applies to the whole school: Senior, Junior and EYFS

It should be read in conjunction with *Keeping Children Safe in Education*, the GDST Online Safety Policy and further safeguarding information and guidance available on the GDST intranet.

Key staff

Name	Role	Email	Telephone
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1. Policy Statement

1.1 Safeguarding and Child Protection Policy

1.1.1 Bromley High School ("the School") is committed to a whole school approach to safeguarding and promoting the welfare of children. All pupils have the right to be protected from all types of harm and abuse, and all school systems, processes and policies should operate with the best interests of the child at their heart. This *Safeguarding and Child Protection Policy* ("this Policy") forms a fundamental part of our approach to providing excellent pastoral care to *all* pupils, including young people who may be over the age of 18 years.

1.1.2 This Policy and its implementation procedures set out the arrangements to safeguard and promote the welfare of pupils at the School. They have been prepared in compliance with, and with regard to:

- The Education Acts
- *Education (Independent Schools Standards) Regulations* 2014 (as amended from time to time)
- *The Independent School Standards Guidance for independent schools* April 2026
- *Safeguarding and protecting people for charities and trustees* (Charity Commission, June 2022)
- Safeguarding Vulnerable Groups Act 2006
- The Protection of Freedoms Act 2012
- The Children Act 1989 and Children Act 2004
- *What to do if you're worried a Child is being Abused* March 2015
- *Working Together to Safeguard Children* March 2026 (A guide to inter-agency working to safeguard and promote the welfare of children)
- *Keeping Children Safe in Education* September 2026
- *Disqualification under the Childcare Act 2006* September 2018
- *Information Sharing Duty: statutory guidance for safeguarding organisations and their*
- *practitioners September 2026*

- DBS Referrals Guidance (as may be amended from time to time)
- *National Minimum Standards for Boarding Schools* May 2026
- *Teacher misconduct: regulating the teaching profession* November 2024 (and related guidance)
- *Restrictive interventions, including the use of reasonable force, in schools* April 2026
- *Preventing and Tackling Bullying* July 2017
- *Mental Health and Behaviour in Schools* November 2018
- Section 3 of the *Statutory Framework for the Early Years Foundation Stage (EYFS)* September 2025
- *Prevent Duty Guidance* December 2023*, Channel Guidance* December 2023*,* and *Prevent duty guidance for those with safeguarding responsibilities* September 2023
- *The use of social media for online radicalisation* July 2015
- *Teaching Online Safety in School* January 2023
- *Sharing nudes and semi-nudes: advice for education settings working with children and young people* UKCIS March 2024
- *Relationships Education, Relationships and Sex Education (RSE) and Health Education* September 2026
- *When to call the police: guidance for schools & colleges* NPCC
- *Meeting digital and technology standards in schools and colleges* March 2025

This list is not exhaustive. The School will also have regard to any other relevant legislation, statutory guidance and local safeguarding partnership procedures issued from time to time.

1.1.3 The School recognises and acts upon the legal duties set out in the above statutes, regulations and guidance, to protect its pupils (and staff) from harm, and to co-operate with other agencies in carrying out those duties and responding to safeguarding concerns.

1.1.4 This Policy is used in accordance with locally agreed inter-agency procedures, and specifically in accordance with Bromley local safeguarding partnership guidance, including the local criteria for action and protocol for assessments (see para 11.3 for contact details). The School will ensure that its safeguarding arrangements take into account local procedures and practice, including local criteria for action and protocol for assessment.

1.1.5 This Policy is addressed to all members of staff and volunteers at the School (including supply staff and trainee teachers). Adherence to this Policy is mandatory for **all** staff and volunteers and its use is not subject to discretion. This Policy applies whenever staff or volunteers are working with pupils, including where this is away from the School, for example at another institution, on educational visits, as well as sporting and cultural activities.

1.1.6 This Policy is available to all parents, staff and volunteers on the School's website. A paper copy of this Policy is also available to parents upon request to the School office.

1.1.7 Pupils are taught about how to keep themselves and others safe both on and offline, including how to adjust their behaviour to reduce risks, keep themselves safe and build resilience. More broadly, the school has a clear set of values and standards, upheld and demonstrated throughout all aspects of school life, and underpinned by the behaviour policy, pastoral support system, the RSE/PSHE programme, and other curriculum and development opportunities that prepare pupils for life in modern Britain. This education is fully inclusive and age- and stage- appropriate.

1.2 <u>Creating a Culture of Safeguarding</u>

1.2.1 The School recognises that safeguarding covers much more than child protection, and so this Policy will operate in conjunction with the GDST School Staff Code of Conduct, further safeguarding information and guidance available on the GDST intranet, and other related policies and procedures. These cover

areas including equal opportunities; Health and Safety; First Aid; educational visits; attendance; anti-bullying; behaviour management; drugs and alcohol; information sharing; online safety (including mobile technology, artificial intelligence (AI), social media and filtering and monitoring); Fundamental British Values and preventing radicalisation and violent extremism. Such policies are available from the School on request.

The School takes seriously its responsibility to promote and nurture the mental health and wellbeing of all its pupils and staff. This is reflected in its policies and procedures for pastoral care and the School's PSHE programme.

1.2.2 'Safeguarding' is broader than 'child protection'. As well as protecting children from harm, 'safeguarding' widens the responsibility to preventing harm and promoting the welfare of children. Safeguarding and promoting the welfare of children is defined in *Keeping Children Safe in Education* as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing the impairment of children's mental and physical health or development
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- Promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship arrangement, whenever possible and where this is in the best interests of the children

Where a child is suffering significant harm, or is likely to do so, action will be taken to protect that child. Action will also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or at immediate risk. The School recognises the importance of children receiving the right help at the right time to address risks and prevent issues escalating, the importance of acting on and referring the early signs of abuse and neglect, keeping clear records, listening to the views of the child, reassessing concerns when situations do not improve, sharing information quickly, and challenging inaction.

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

1.2.4 As well as ensuring that the School's policies and procedures support its safeguarding responsibilities, the School will work with pupils and their families, and contribute to inter-agency working, in line with the statutory guidance *Working Together to Safeguard Children*. This includes providing a co-ordinated offer of Early Help or Family Help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans.

We are committed to working in partnership with parents, Children's Social Care and diverse communities, to continuously develop and improve the safeguarding culture within our School.

1.2.5 Having these safeguards in place not only protects and promotes the welfare of children but also enhances the confidence of our staff, volunteers, parents/carers and the general public.

1.2.6 The School has systems to:

- Prevent unsuitable people working with pupils;
- Identify pupils who are at risk of and/or are likely to suffer significant harm and take appropriate action, and promote the welfare of pupils in need of additional support;

- Promote safe practice and challenge poor and unsafe practice;
- Protect students and staff from online risks; these include online safety education and training, policies and procedures governing the use of IT, and procedures to manage any incidents that occur;
- Provide filtering and monitoring in line with the guidance issued by the Department for Education in their filtering and monitoring standards;
- Deal with issues of confidentiality, information sharing and consent;
- Ensure that staff do not, through their actions, place **pupils** at risk of harm, or place themselves at risk from an allegation of harm (by providing guidance on areas such as 1:1 tuition , conveying by car, inappropriate electronic communication). Relevant guidance can be found in the GDST School Staff Code of Conduct.

1.2.7 The School encourages the pupils in its care to raise any concerns that they might have and ensure that these are taken seriously. The School also encourages pupils to contribute their own ideas, appropriate to their age and understanding, about how their safety and welfare could be further improved.

1.2.8 All staff are required to adhere to the *ICT Acceptable Use Agreement*, and specifically to ensure that any images taken of pupils are appropriate and stored and managed safely.

1.3 Implementation Procedures

The School has implementation procedures to assist staff and volunteers when handling safeguarding concerns.

Information on these procedures is available to all staff and volunteers at the School and the procedures must be followed at all times.

1.4 Early Years Foundation Setting

1.4.1 This Policy applies to the School's provision for the Early Years Foundation Setting ('EYFS'). The identity of and contact details for the Designated Safeguarding Lead/s with responsibility for safeguarding within this setting are set out at the head of this policy and in para 11.1 below.

1.4.2 Throughout the setting all persons in the EYFS are required to adhere to the *ICT Acceptable Use Agreement* on the use of mobile phones, cameras or other digital recording devices: that is, that personal digital recording devices must not be used for taking, editing or transferring images or videos of pupils.

1.4.3 Safeguarding training for staff in the EYFS will include content designed specifically for staff caring for children aged 0-5 years, which will be renewed every two years as a minimum. It will cover the criteria for effective safeguarding training set out in Annex C of the EYFS Statutory Framework. The DSL for the EYFS will support staff to put their training into practice.

1.5 Children potentially at greater risk of harm

1.5.1 Children with Special Educational Needs and Disabilities or Health Issues

Children with special educational needs and disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline, including particular vulnerability to child on child abuse. Staff must be alert to the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These may include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- Being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;

- The potential for children with SEND or certain medical conditions to be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
- Communication barriers and difficulties in managing or reporting these challenges and the risk of not understanding that what is happening to them is abuse;
- The need for intimate care or being isolated from others;
- Being more likely to be dependent on adults for care; and
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or the consequences of doing so.

To address these additional challenges, such children may require extra pastoral support and attention, alongside any appropriate support for communication. Their additional vulnerabilities should also be particularly carefully considered in situations where the use of reasonable force may be needed. Any reports of abuse involving children with SEND will require close liaison with the DSL and SENCO.

The fact that there has been an incident relating to the management of a child or young person's medical condition (including allergies) would not in and of itself warrant a referral to local safeguarding partners. A safeguarding referral would only be needed where an incident highlighted concern that the child or young person might be at increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition. This might occur where relevant information about a child or young person's medical condition is not provided, or where they are repeatedly sent without essential medication, thereby putting them at risk.

1.5.2 Children who are lesbian, gay, bisexual or gender questioning

Being lesbian, gay or bisexual is not in itself an inherent risk factor for harm. However, children who are lesbian, gay or bisexual or perceived to be lesbian, gay or bisexual can be targeted by other children and risks can be compounded where such children lack a trusted adult. Staff should therefore endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns.

When supporting a gender questioning child, the school will not initiate any action. The school will take time to understand the thoughts and feelings of a child questioning their gender and will be appropriately professionally curious about the full range of the child's experiences. Staff should remain aware of potential vulnerabilities including the possibility of complex mental health and psychosocial needs for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying. In making decisions about supporting social transitions, staff will comply with their distinct but interacting obligations under safeguarding legislation and equality and human rights law. The DSL will be involved in all cases where a child is questioning their gender, and parents will be involved in the vast majority of cases unless a documented specific safeguarding risk exists.

1.6 For information on children who need a social worker, children absent or missing from education, elective home education, looked after children and care leavers see the safeguarding information and guidance on the GDST intranet.

1.7 Private Fostering

Private fostering occurs where a child under the age of 16 (or 18 if disabled) is provided with care and accommodation by someone who is not a parent, has parental responsibility or is a relative, in that person's home. If a member of staff becomes aware that a pupil may be in a private fostering arrangement, they should raise this in the first instance with the Designated Safeguarding Lead. The School will then notify the local authority of the circumstances. Schools should also report homestay arrangements for sponsored students to the local authority as these are also considered private fostering. Further information on sponsored students can be found in the information and guidance on the GDST intranet.

2. Aims

2.1 Our aims are to:

2.1.1 Create an environment in the School which is safe and secure for all pupils.

2.1.2 Encourage our pupils to establish satisfying relationships within their families, with peers and with other adults.

2.1.3 Encourage children to develop a sense of autonomy and independence.

2.1.4 Work with parents to build their understanding of and commitment to the welfare of all pupils.

2.2 In order to fulfil these aims the Head will take the necessary steps to ensure that:

2.2.1 All staff (including supply staff, temporary staff and trainee teachers), governors and volunteers receive training in safeguarding children and an explanation of the systems within the School which support this as part of their induction. This includes:

- the School's Safeguarding and Child Protection Policy (which includes whistleblowing procedures) and GDST School Staff Code of Conduct
- Part 1 of *Keeping Children Safe in Education* (and Annex A for those who work directly with children)
- The School's behaviour policy
- The safeguarding response to children who are absent from education
- The identity and role of the Designated Safeguarding Lead(s) and Deputy Designated Safeguarding Lead(s)
- Online safety

2.2.2 All staff, governors, volunteers and the Head are trained in child protection (including Prevent awareness, online safety training, the local Early Help/Family Help process, the referrals process and how to manage a report of child on child sexual violence or sexual harassment) regularly (in line with local safeguarding partner requirements), and receive safeguarding and child protection updates as required, but at least annually. Safeguarding training must be integrated, aligned and considered as part of the whole school safeguarding approach and staff training programme. The Designated Safeguarding Lead(s) must receive the required updated child protection and Prevent training at least every two years (as set out in Annex B of *Keeping Children Safe in Education*)

2.2.3 The School adheres to the GDST's Recruitment Policy and guidance and safer recruitment procedures (available on the GDST intranet and from the School on request). Procedures are in accordance with the *Independent School Standards Regulations* and include ensuring that at least one member of any recruitment panel involved in all stages of the recruitment process has undertaken the appropriate training in Safer Recruitment, and carrying out all required checks on the suitability of all staff and volunteers to work with children and young people in accordance with the guidance and regulations set out at paragraph 1.1.2. Appropriate supervision arrangements are put in place if staff start work before their DBS disclosure has been obtained, and in all cases a Barred List Check and Prohibition Order check (if applicable) will have been undertaken. Relevant staff are also asked to confirm that they do not meet the criteria for disqualification under the Childcare Act 2006 and the 2018 Regulations.

2.2.4 The School obtains written assurance that appropriate child protection checks are carried out and procedures apply to any staff or volunteer of another organisation who work with the School's pupils on another site (for example, in a separate institution).

2.2.5 Appropriate checks are carried out on external visitors coming onto the school site, depending on their business with the School and level of contact with children. Where relevant, this will include an assessment of the suitability, educational value and age appropriateness of any activities or material to be delivered. Further details can be found in the School's Visiting Speakers Protocol.

2.2.6 The School carries out the mandated checks on the suitability of all people who serve on the School Governing Board in accordance with the guidance and regulations set out at paragraphs 1.1.2 and in accordance with GDST policy. The required checks on Trustees (as the proprietors) are carried out centrally by the GDST.

2.2.7 The School will refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child where it is believed that the individual:

- Has engaged in relevant conduct in relation to children and/or adults. An action or inaction has harmed a child or vulnerable adult, or put them at risk of harm; or
- Has satisfied the harm test in relation to children and / or vulnerable adults (e.g. there has been no relevant conduct but a risk of harm to a child or vulnerable adult still exists); or
- Has been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence; **and**
- the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed if they had not left (this includes suspension or deployment to another area of work that is not regulated activity)

The referral will be made as soon as possible after the resignation, removal or redeployment of the individual in accordance with the procedural guidance at https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs. In cases involving teaching staff, the School will also consider whether it would be appropriate to refer the matter to the Teaching Regulation Agency (TRA) who may decide to prohibit the individual from teaching.

2.2.8 All School staff are alert to signs of abuse and neglect, and all staff know to whom they should report concerns or suspicions of abuse or neglect.

2.2.9 All School staff keep themselves updated on safeguarding issues and child protection procedures by accessing advice, guidance and training as appropriate to their role.

2.3 This Policy is compatible with and meets all applicable requirements of Bromley local safeguarding partnership. The School ensures that it has positive communication with the local safeguarding partners to ensure compliance with local protocol and access to relevant support. The local safeguarding partnership can be contacted through the local authority Children's Social Care. Their contact details are set out in paragraph 11.3 below.

3. Responding to Safeguarding and Child Protection Concerns

3.1 Everyone who comes into contact with children and their families has a role to play in safeguarding children. School staff are particularly important as they are in a position to identify concerns early and provide help for children, to prevent concerns from escalating. School staff have a responsibility to identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm. All staff then have a responsibility to take appropriate action, working with other services as needed.

3.2 Any concern, allegation or incident of abuse must be referred to the Designated Safeguarding Lead immediately. Staff should not assume that a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about sharing information or recording requirements, staff should discuss this with the Designated Safeguarding Lead. Fears about sharing information **must not** be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children. Should staff have safeguarding concerns about a child who is not a pupil (e.g. a sibling, or a child attending an activity on the premises), they should still follow the safeguarding procedures and report to the DSL immediately.

3.3 If staff have concerns about a child (as opposed to a child being in immediate danger or at risk of harm – see para 3.5 below) they will need to decide what action to take. All staff should be prepared to identify children who may benefit from **Early Help**, that is, support as soon as a problem emerges. Such problems should be discussed in the first instance with the Designated Safeguarding Lead. The Early Help process may also involve sharing information with other professionals and contributing to an Early Help assessment.

3.4 Any child may benefit from Early Help, but 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 specific additional needs
- Has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- Has a mental health need
- Is a young carer
- Is pregnant and or is a parent themselves
- Has exhibited early signs of abusive, violent and/or harmful behaviours
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from education, home or care
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- Is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
- Is at risk of being radicalised into terrorism
- Has a parent or carer in custody, or is affected by parental offending
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing alcohol and other drugs themselves
- Is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage, and
- Is a privately fostered child.

3.5 If a child is in **immediate danger or at risk of harm**, this must be reported to the Designated Safeguarding Lead, who will make a referral to local authority Children's Social Care and/or the police immediately (see section 5.12). It is not the role of the School to investigate suspected or alleged abuse; this is the role of the Police and Children's Social Care.

3.6 <u>What is Child Abuse?</u>

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institution or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse. This may be an indicator of wider safeguarding concerns and should be responded to in line with this policy. Abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

The categories and definitions listed below are drawn from *Keeping Children Safe in Education* and *Working Together to Safeguard Children*:

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

3.6.2 **Emotional abuse** – the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse, such as persistent criticism, belittling, or name-calling, as well as not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

3.6.3 **Sexual abuse** - involves forcing, causing or inciting a child to take part in sexual activities, nor necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, such as acts of penetration, whether that is with part of a person's body or an object (e.g. rape or assault by penetration), and non-penetrative acts such as masturbation, kissing, rubbing, and touching over clothing. Sexual abuse may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online as well as offline, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it. There are specific offences for children under 13, who can never provide valid consent to sexual activity and there are specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.

3.6.4 **Neglect** - 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, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

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

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

3.6.5 Child sexual exploitation (CSE), child criminal exploitation (CCE) and forms of so-called 'honour based' abuse, including female genital mutilation (FGM) are child abuse, and domestic abuse and attempts to draw children into violent extremism or serious violent crime should also be treated as safeguarding issues. Further information on these areas can be found in the safeguarding information and guidance on the GDST intranet. If a teacher discovers that an act of FGM appears to have been carried out on a girl under the age of 18 the teacher must report this to the police.

3.6.6 Consensual and non-consensual making or sharing of nudes and semi-nudes - including those generated by using AI - is a child protection issue. Even if explicit material is sent or elicited without malicious intent the consequences are serious and put those involved at risk of serious harm. Having or sending explicit material on digital devices is also a criminal offence for those under 18. Pupils are taught about this as part of their internet safety education. The School takes incidences of this nature extremely seriously, and deals with them in accordance with child protection procedures, including reporting to the police.

3.6.7 **Who are the abusers?** Abusers might be parents or carers, siblings or members of the extended family, neighbours, teachers, strangers; in short, an abuser could be anyone.

3.6.8 **Child on child abuse (including harassment and violence):** all staff should also recognise that children are capable of abusing other children, and that this can happen and must be addressed whether it occurs inside school, outside school or online. Even if there are no reports, it does not mean it is not happening, it may be the case that it is just not being reported. For this reason, it is important that staff are aware of the school's policy and procedures with regard to child on child abuse, and conscious of the important role they have to play in preventing it and responding where a child may be at risk from it. It is also important that pupils feel able to report incidents, knowing they will be treated seriously. Child on child abuse is most likely to include, but is not limited to:

- bullying (including cyber, prejudice-based and discriminatory bullying)
- discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice-based incidents
- abuse in intimate personal relationships between children (also known as teenage relationship abuse)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- serious physical assault and harm, or the threat of harm with a weapon
- harmful sexual behaviour, sexual violence and sexual harassment – which may include misogyny/misandry

- consensual and non-consensual making or sharing of nudes and semi-nudes, including those generated by AI
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals

For some (but not all) forms of child on child abuse it is more likely that girls will be victims and boys perpetrators, but all child on child abuse is unacceptable and will be taken seriously. Child on child abuse should be recognised as abuse and challenged as such. A zero tolerance approach will be taken whereby it is never passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'. This can lead to a culture of unacceptable behaviours, misogyny, an unsafe environment for children and at worst children accepting this as normal and not coming forward to report it. The School seeks to minimise the risk of such abuse by ensuring that it is clear to all members of the school community that it is not tolerated, and by educating pupils as part of the PSHE programme about healthy and respectful relationships, the wider societal factors (such as sexist stereotypes and language), and how to recognise, report and respond to child on child abuse.

Child on child abuse is a safeguarding issue for both the victim and alleged perpetrator. It is also preventable, and timely, evidence-based support can be the key to preventing children from going on to commit abuse or violence. Any concern about child on child abuse must be reported to the DSL. Allegations will be promptly and thoroughly investigated, recorded and treated according to their gravity, in line with the School's anti-bullying or behaviour policy. The threshold for dealing with an issue

of pupil behaviour or bullying under the safeguarding procedure is, subject to local specifics as in any other cases, when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. In such cases the School's response will include referral to local authority children's social care or the police. Victims, perpetrators and any other child affected will be supported within the pastoral care structure, taking account of their views and feelings, and support may include counselling where appropriate. All children involved will be treated as 'at risk'. Further information can be found in the safeguarding information and guidance on the GDST intranet.

3.6.9 **Contextual safeguarding:** safeguarding incidents and/or behaviours can be associated with factors outside school and children can be at risk of abuse or exploitation in their family or in situations outside their families. Extra familial harms take a variety of forms and children can be vulnerable to multiple harms. All staff should consider the context within which incidents and/or behaviours occur. It is important to provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

3.6.10 **Operation Encompass:** the School is part of Operation Encompass, which is an information sharing scheme intended to support children who experience domestic abuse. Under their statutory duty, the police are required to notify a school if they have grounds to believe that a pupil may be a victim of domestic abuse. This notification should be shared with the school's designated Key Adult prior to the start of the school day after the incident, and should include the child's details, their relationship to the perpetrator and the voice of the child, such as what they are saying and how they are behaving.

3.7 Signs of abuse

All School staff members should be aware of indicators of abuse, neglect and exploitation, and modern slavery, understanding that children can be at risk of harm inside and outside school, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

The following may help staff to be aware of possible signs of abuse - There are further sources of information such as *What to do if you're worried a child is being abused* and the NSPCC website. However, such lists are not exhaustive - if staff members are unsure, they should always seek advice and report concerns even where signs/indicators are not present. Staff should also be alert to behaviours or circumstances that put children at risk of harm, such as drug taking, alcohol misuse, serious violence, radicalisation and consensual and non-consensual making or sharing of nudes and semi-nudes images and/or videos.

(There may be other signs of abuse specific to female genital mutilation, and to radicalisation of young people. These are described in the relevant sections in the safeguarding information and guidance on the GDST intranet.)

3.7.1 Physical Abuse

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

3.7.2 Emotional Abuse

- Excessive overreaction to mistakes
- Continual self-deprecation

- Excessive rocking, thumb sucking, hair twisting
- Extreme compliance/aggression
- Drug, alcohol and substance misuse
- Significant peer relationship difficulties

3.7.3 Sexual Abuse

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

3.7.4 Neglect

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

3.7.5 Children absent from education

A child missing or persistently absent from an education setting is a potential indicator of abuse, neglect,exploitation or modern slavery. Staff should treat prolonged or repeated absence, or particular patterns of absence, with no satisfactory explanation, as a potential safeguarding issue and take action accordingly.

3.7.6 Mental Health

All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, signs of an eating disorder, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. It is also important that staff are aware how adverse childhood experiences can have a lasting impact on children's mental health, behaviour and education.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff do however have an important role to play in:

- Promoting good mental wellbeing and preventing the onset of mental illness;
- Observing pupils and identifying early those who may be experiencing mental health problems or being at risk of developing one;
- Ensuring early targeted support is provided, and
- Liaising with or referring to specialist services where needed.

If staff have a concern about a child's mental health which also constitutes a safeguarding concern, immediate action should be taken following the procedures in this policy.

3.7.7 Prejudice-based harm

All staff should recognise that children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination. Such experiences may affect a child's welfare, wellbeing, mental health, and willingness to seek help. Staff should be alert to the signs and impact of prejudice-based harm and ensure that concerns are considered within safeguarding practice where appropriate.

4. Designated Safeguarding Lead (DSL)

4.1 The School has appointed Designated Safeguarding Leads and deputies to contact in their absence. The Designated Safeguarding Leads are Mrs Taiana Hathway and Mrs Kelly Powell members of the School's Senior Leadership Team with the necessary status and authority to take lead responsibility for child protection matters (including online safety). This responsibility cannot be delegated. The School will ensure that the Designated Safeguarding Lead is given the time/cover, funding, training, resources and support to fulfil their role.

During term time, the Designated Safeguarding Lead and/or a deputy will always be available (during school hours) for staff to discuss any safeguarding concerns. Robust cover arrangements will be put in place for any periods when the Designated Safeguarding Lead is unavailable, and for out of hours/out of term activities. Designated Safeguarding Leads are not required to monitor or respond to alerts generated by the school internet filtering and monitoring solution outside their contracted working hours, however they should ensure appropriate arrangements are in place, including during the school holidays, to ensure alerts are reviewed and acted upon in a timely manner. The Designated Safeguarding Leads will ensure that arrangements for cover are communicated clearly to staff.

The Designated Safeguarding Leads will:

4.1.1 be responsible for ensuring that all cases of suspected or actual child protection concerns are dealt with in accordance with the guidance and regulations set out at paragraphs 1.1.2;

4.1.2 refer cases of suspected abuse or allegations to the local Social Services Department and/or the police in accordance with local safeguarding partner procedures, and work with other agencies in line with *Working Together to Safeguard Children;*

4.1.3 receive *Prevent* awareness training; provide advice and support, and make appropriate referrals through the *Channel* programme;

4.1.4 take lead responsibility for online safety (as outlined in the Online Safety Policy)

4.1.5 ensure that they are aware of the latest national and local guidance and requirements and will keep the Head, staff and volunteers informed as appropriate;

4.1.6 receive appropriate training in child protection matters and inter-agency working, to include both national and local bodies, at least every two years, and in addition to formal training, update their knowledge and skills at regular intervals and at least annually, in order to keep up with developments relevant to the role. Deputy DSLs will be trained to the same level as DSLs;

4.1.7 ensure that the Head, staff and volunteers (including but not limited to: part-time staff, supply staff, peripatetic staff, newly appointed staff, newly qualified staff, trainee teachers, before/after school care staff, boarding staff, gap year students, volunteers, catering staff, cleaning staff and caretakers) understand their role as appropriate in the child protection procedures and have the relevant level of regular training in child protection and Prevent awareness, keeping an up to date itemised record of such training, including induction, refresher updates, updates to Keeping Children Safe in Education, and safer recruitment training.

4.1.8 act as a source of advice and support within the School and co-ordinate action regarding referrals in relation to both children and allegations against staff;

4.1.9 share information appropriately in order to keep children safe, including with the School Nurse, so that any medical assessment carried out is complete. The maintenance of close links between the Designated Safeguarding Lead and the school nurse, allowing the regular sharing of contextualised information, is in the best interests of the pupil;

4.1.10 submit a termly safeguarding report to the School Governing Board (copied to the Compliance and Pastoral Manager at Trust Office)

4.1.11 Work with the Head to ensure that any deficiencies or weaknesses identified in the school's policy or procedures are reported to the Director of Education without delay.

5. Responding to Disclosures of Abuse

5.1 Children are more likely to be abused by someone they know and trust than by a stranger. Staff members are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. Staff should also 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 feel embarrassed, humiliated, or threatened. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. When concerned about the welfare of a child, staff members should always take action in the best interests of the child, and consider how best to build trusted relationships with children which facilitate communication.

5.2 Staff and volunteers should make themselves available to reassure the pupil that what they are saying is being taken seriously and without criticism, and should respond in a supportive, calm manner, avoiding asking detailed questions. The role of the staff member or volunteer is to listen, record and report; not to investigate. A pupil should never be given the impression that they are creating a problem by reporting any form of abuse and/or neglect. No pupil should ever be made to feel ashamed for making a report. Furthermore, consideration should be given to language and cultural needs, as for example talking about sensitive subjects in a second language can make the experience more traumatic. Advice should be sought if necessary to support children from diverse cultural backgrounds. However, potential harmful practices should never be overlooked on the basis of cultural sensitivity. Staff and volunteers should also take care to ensure that their behaviour and actions do not place pupils or themselves at risk of harm.

5.3 If a pupil reports abuse from another pupil or pupils, staff should follow the procedures in this section. A disclosure relating to harmful sexual behaviours should, if possible, be managed with two members of staff present (preferably one being the DSL or a DDSL). All children involved, whether a potential perpetrator or victim, will be treated as being 'at risk'. The Designated Safeguarding Lead will liaise with local agencies in relation to handling any such cases which arise. Further guidance can be found in *Keeping Children Safe in Education* (Part 5). A bullying incident will be regarded as a child protection concern where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. See the Anti-Bullying Policy.

5.4 <u>Immediate Response</u>
If a disclosure is made, the member of staff or volunteer **should**:

5.4.1 allow the pace of the conversation to be dictated by the pupil;

5.4.2 ask open questions which encourage the pupil to talk such as "can you tell me what happened?"

5.4.3 accept what the pupil says and not ask for further detail;

5.4.4 acknowledge how hard it was for them to tell you and show by voice tone and/or facial expression that you are taking their concerns seriously;

5.4.5 note carefully any clearly visible external signs of possible injury or neglect (but note paragraph 5.5.4 below);

5.4.6 reassure the pupil that they have done the right thing, that they are not at fault, and explain whom you will have to tell (the Designated Safeguarding Lead) and why.

5.5 The member of staff or volunteer **should not**:

5.5.1 burden the pupil with guilt by asking questions such as "why didn't you tell me before?"

5.5.2 interrogate or pressure the pupil to provide information;

5.5.3 ask any potentially leading questions, as this may impact on any potential case brought to court;

5.5.4 undress the child or examine clothed parts of the child's body in an attempt to determine the nature of any such injuries/neglect;

5.5.5 criticise the alleged perpetrator (this may be someone they love);

5.5.6 promise confidentiality (see paragraph 5.6 and 5.7);

5.5.7 make promises that they cannot keep such as "I'll stay with you all the time" or "it will be alright now";

5.5.8 put words in the child's mouth (i.e. finish their sentences);

5.5.9 jump to conclusions or speculate about what happened or might have happened, or make accusations;

5.5.10 show an overly emotional reaction, such as expressing disgust, shock or disbelief;

5.5.11 attempt to investigate the allegations.

5.6 If a pupil confides in a member of staff or volunteer and requests that the information is kept secret, staff/volunteers ***must not*** *make promises about confidentiality.* Staff must tell the pupil sensitively that they have a responsibility to tell the named Designated Safeguarding Lead so that the child can be helped to stay safe and feel better.

5.7 In every case, the member of staff/volunteer should consider whether the pupil is able to provide consent for the information to be shared and if so, seek to obtain that consent in accordance with the GDST School Staff Code of Conduct. If the pupil does not consent, the member of staff/volunteer should explain that they need to share the information with the Designated Safeguarding Lead and reassure them that the information will *only be disclosed* to other people who *need to know.*

5.8 The School recognises that a child who is abused may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. We recognise that the School may provide the only stability in the lives of children who have been abused or who are at risk of harm. The School has age appropriate systems in place for children to express their views and give feedback so that their wishes or feelings will be taken into account when determining what action to take and what services to provide. However, the child's wishes or feelings cannot override the duty to refer suspected abuse to local authority children's social care or police.

5.9 The School will provide continuing support to a pupil who has disclosed abuse through promoting a caring and safe environment within the School and encouraging self-esteem and self-assertiveness through the curriculum and through relationships. In doing so, the School will act in accordance with guidance from the relevant authorities to ensure that, for example, legal proceedings are not compromised.

5.10 All allegations involving staff or volunteers will be discussed with the Local Authority Designated Officer (LADO[1]) before any investigation takes place. In borderline cases, these discussions can be held without naming the individual.

In any case of immediate risk or serious harm to children, the police shall be informed at the outset.

5.11 Recording Information

Staff/volunteers should:

5.11.1 alert the Designated Safeguarding Lead;

5.11.2 make a record (on CPOMS if possible) of the disclosure or concern, including the date, time, place and context, and what has actually been said (wherever possible using the child's exact words, even if they seem childish, rude or inappropriate), not assumption or interpretation;

5.11.3 clearly distinguish between fact, observation, allegation and opinion;

5.11.4 record any observed injuries and bruises;

5.11.5 note the non-verbal behaviour and the key words in the language used by the pupil (do not translate into "proper terms");

5.11.6 if CPOMS is not used, ensure the record is signed and the date and time is noted;

5.11.7 appreciate that their records may be used in criminal proceedings or disciplinary investigations.

5.12 Reporting Concerns

5.12.1 Any concerns about pupils must be discussed with the Designated Safeguarding Lead (or in their absence the Deputy Designated Safeguarding Lead) as soon as possible and at the latest by the end of the school day.

5.12.2 Where the disclosure identifies a safeguarding issue, the Designated Safeguarding Lead will report the disclosure to the local Social Services Department within 24 hours. In the most serious cases, and if there is suspicion that a crime has been committed, the Designated Safeguarding Lead will contact the police.

5.12.3 The School's procedures differentiate between safeguarding children who have suffered significant harm and those who are in need of support from one or more agencies. In cases where a child is not suffering or at risk of suffering serious harm, but rather is in need of additional support, an inter-agency assessment will be undertaken to determine the most appropriate action.

5.12.4 Whilst the Designated Safeguarding Lead will usually decide whether to make a referral, **in exceptional circumstances, such as in an emergency or a genuine concern that appropriate action has not been taken, anyone can refer their concerns to local authority children's social care directly** (see section 9 below). If a member of staff makes a referral independently, they must inform the Designated Safeguarding Lead as soon as possible thereafter.

5.12.5 **If, at any point, there is a risk of immediate serious harm to a child a referral should be made immediately. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point.**

5.12.6 For pupils over the age of 18, safeguarding concerns are considered in the context of concerns for their welfare as well as the welfare of others who may be affected and who may be children. It may

[1] Local Authority Designated Officer(s) for Child Protection. Each local authority should have designated a particular officer, or team of officers, to be involved in the management and oversight of allegations against people that work with children. The term 'LADO' in this Policy is used for convenience to designate these local authority designated officer(s) or other appropriate first point of contact for child protection concerns, whatever terminology individual local safeguarding partners may use.

be necessary to refer such concerns to the local safeguarding adult social care services in place of, or in addition to children's social care.

6 Allegations against staff

6.1 Schools must follow the procedures for handling allegations made against staff members (including supply staff, trainee teachers, volunteers and contractors), set out in Part 4 of *Keeping Children Safe in Education*. The aim is to deal with any allegation quickly and in a fair and consistent way which provides effective protection for the child and at the same time provides appropriate support for the person who is the subject of the allegation. The same procedures and principles apply should the school receive a safeguarding concern or allegation about an organisation or individual using the school premises (for example community groups or holiday lets).

6.2 Where a safeguarding-related allegation or cause for concern is made against any member of staff (including supply staff, trainee teachers, volunteers and contractors and the Designated Safeguarding Lead), the matter should be reported immediately to the Head (unless the allegation relates to the Head or there is a conflict of interest in reporting the matter to the Head). The Head should **not speak** to the member of staff who is the subject of the allegation at this point. In the absence of the Head the allegation should be reported to the Director of Legal and Risk Assurance at Trust Office (or in their absence the Chief Executive). An allegation or cause for concern about a member of the School Governing Board should be reported to the Head, who will also notify the Chair of Council.

6.3 Where a safeguarding related allegation or cause for concern is made against the Head or there is a conflict of interest in reporting the matter to the Head, it should be reported immediately to the Director of Legal and Risk Assurance at Trust Office (or in their absence the Chief Executive) without informing the Head. The Director of Legal and Risk Assurance will in turn inform the member of the GDST Council who is the Safeguarding Lead.

6.4 Where a safeguarding related allegation or cause for concern is made against a member of Trust Office staff, the matter should be reported immediately to the Director of Legal and Risk Assurance at Trust Office (or in their absence the Chief Executive). An allegation or concern about a Trustee should be reported to the Chair of Council (or, in their absence or if the concern is about the Chair of Council, the report should be made to the Director of Legal and Risk Assurance).

6.5 **In all cases contact should be made with the LADO** to discuss the allegation. The Legal and People & Culture Departments at Trust Office must also be notified. Before contacting the LADO, the school should conduct basic enquiries in line with local procedures to establish the facts and to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. A decision as to how to proceed and eventually whether or not to suspend a member of staff or volunteer will be taken by the Head following consultation with the LADO (and, in the most serious cases, the police) and the GDST. Where an allegation relates to a member of supply staff provided by an agency, the agency will be fully involved. Discussions should be recorded in writing, and any communication with both the individual and the parents of the child/children agreed in line with LADO advice. Suspension is not an automatic response and the decision will be taken according to the circumstances of each particular case, giving due weight to the views of the LADO, and guidance in *Keeping Children Safe in Education* and *Working Together to Safeguard Children*. The decision as to whether or not to suspend the Head is taken by the GDST alone (having consulted the relevant authorities).

6.6 In considering the available options, including redeployment of the member of staff (including supply staff, trainee teachers, volunteers and contractors), the LADO, GDST and the Head will ensure that their primary concerns are the safety and wellbeing of the pupils, together with the need for a full and fair investigation which will be led by the LADO, the police or the school under the LADO's guidance.

6.7 The School will refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, as outlined in para 2.2.6 above. Where it is established that they have met the conditions for a referral, this will be made as soon as possible, and ordinarily on conclusion of investigation, when the individual is removed from regulated activity. In cases involving teaching staff, the School will also consider whether it would be appropriate to refer the matter to the Teaching Regulation Agency (TRA) who may decide to prohibit the individual from teaching.

A referral to the TRA should be drafted and submitted by the Head after consultation with the Legal and People & Culture departments at Trust Office who can provide support and guidance on whether matters meet the threshold for referral. The obligation to refer cases to the TRA is at an employer's discretion taking into consideration whether the conduct is sufficiently serious. The test of seriousness is whether an individual's behaviour is fundamentally incompatible with being a teacher. Each case will turn on its own facts but the GDST's broad approach (in line with guidance from the TRA) is that referrals should be made if a teacher is dismissed for gross misconduct and that conduct breaches Teachers' Standards or raises doubts about a suitability to work with children.

Schools should keep a record of all referrals that are made, as well as of any borderline cases where the decision was ultimately made not to refer, together with the reasons for those decisions.

6.8 Where required to do so, we will provide information to the DBS or TRA in respect of a member of staff or volunteer in accordance with our legal duty.

6.9 Communications with the School community about safeguarding-related allegations shall only be made following consultation with the LADO and any investigating authorities. There are restrictions on the reporting or publishing of allegations against teachers (which apply up to the point where the accused person is charged with an offence, or the DfE/TRA publish information about an investigation or decision in a disciplinary case). Every effort will be made to maintain confidentiality and guard against unwanted publicity. The Legal Department will advise on the statutory reporting restrictions on publication of details of allegations.

6.10 If there has been a substantiated allegation against a member of staff (including supply staff, trainee teachers, volunteers and contractors), the School will work with the LADO to determine the next steps to be taken with regard to the individual as well as whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

6.11 <u>Low-level concerns</u>

6.11.1 A low-level concern about the behaviour of a member of staff (including supply staff, trainee teachers, volunteers and contractors) is one where such behaviour does not meet the 'harm threshold' and yet appears to be inconsistent with the staff code of conduct or professional boundaries.

6.11.2 It is crucial that any such concerns should be shared as soon as reasonably possible. This will maintain an open and transparent culture within the School, reinforcing its ethos and values; ensure that adults working in the School act within professional boundaries; and enable concerning, problematic or inappropriate behaviour to be identified and addressed early, minimising the risk of abuse.

6.11.3 Low-level concerns about a member of staff may be shared initially with the DSL or the Head. If the former, the DSL should inform the Head of any concern in a timely manner. Low-level concerns about the Head should be reported to the Director of Legal and Risk Assurance (or in their absence the Chief Executive). Staff are encouraged to self-refer where, for instance, they have found themselves in a situation which could be misinterpreted, or on reflection feel they may have compromised the School's expected professional standards.

Reports about supply staff and contractors will be notified to their employers so that any potential patterns of inappropriate behaviour can be identified.

6.11.4 The Head (or a nominated deputy) will investigate the concern, speaking to the person who raised the concern, the individual involved, and any witnesses. The evaluation of the concern should always be undertaken in consultation with the LADO. The Legal Department at Trust Office should be notified of low level concerns referred to the LADO, and can also provide advice if needed. The action to be taken will be determined by and proportionate to the nature of the incident, whether the report can be substantiated and whether any pattern of behaviour appears to be emerging. Support will be offered where appropriate and where needed to enable the member of staff in question to correct their behaviour in future.

6.11.5 The Head must record all low-level concerns in writing, including details of:

- The concern,
- The context of the report,
- The name of the individual sharing the concern (requests for anonymity should be respected as far as reasonably possible);
- Action taken and the rationale for this.

6.11.6 Records of low-level concerns must be reviewed periodically in order to identify any patterns of concerning, problematic or inappropriate behaviour. Should a pattern of behaviour be identified, the School will decide on a course of action depending on the nature of the concerns. This will include referral to the LADO if the harm threshold is met. The review of records will also consider whether these indicate any wider cultural issues in the School which should be addressed by revising school policies or providing further training.

6.11.7 Further guidance on low level concerns can be found in *Keeping Children Safe in Education* part 4.

7. Roles and Responsibilities

7.1 The GDST and the School have separate procedures which detail the roles and responsibilities of all staff, volunteers and governors in relation to safeguarding. In summary every member of staff and every volunteer who assists the School should:

7.1.1 protect pupils from abuse

7.1.2 follow the GDST and the School's safeguarding policy and procedures, and read sections of *Keeping Children Safe in Education* appropriate to their role, including subsequent updates to this guidance

7.1.3 know how to access and implement the procedures

7.1.4 know the identity of the School's Designated Safeguarding Lead/s and who to speak to in the absence of the Designated Safeguarding Lead/s

7.1.5 report all safeguarding concerns to the Designated Safeguarding Lead (subject to paragraphs 5.12.4, 6.2 and 6.3 of this Policy)

7.1.6 keep a record of any safeguarding concern, conversation or incident (in accordance with paragraphs 3.2 and 5.11 of this Policy)

7.1.7 undertake appropriate training as detailed in 2.2.2 above.

8. Referring Concerns to Social Services

8.1 The decision to make a referral is a serious matter and requires careful judgement. Such decisions should usually only be taken by the Head or by the Designated Safeguarding Lead, who will liaise with the Head as appropriate, following consultation with Social Services. In cases of serious harm, or if a crime may have been committed, the police will be informed from the outset. However, anyone can refer their concerns to local authority children's social care directly (see section 9 below).

8.2 Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that schools provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

8.3 Parental consent is not a requirement for sharing information with statutory agencies. However, schools have a role in supporting engagement with families, and where safe to do so, should be open and transparent about why information is shared, what might be shared and how it will be used. School staff should exercise professional judgement in deciding when and how to inform families, taking account of any risks that transparency itself may pose. Decisions should be proportionate, clearly recorded and focused on the best interests of the child. Advice can also be obtained from the Legal Department at Trust Office.

8.4 In the case of concerns about a pupil being at risk of radicalisation, school staff should follow safeguarding guidelines by reporting to the Designated Safeguarding Lead. This may lead to a referral through the *Channel* programme.

8.5 In accordance with paragraph 5.12.2 of this Policy, where the disclosure relates to actual abuse or the suspicion of abuse, the Designated Safeguarding Lead will report the disclosure to Children's Social Care within 24 hours.

8.6 In the event of the School making a referral to Children's Social Care, they should agree with the recipient of the referral what exactly the child and parents will be told, by whom and when. The Designated Safeguarding Lead should ask to be kept informed of the timing of the strategy discussion between Children's Social Care and the police, which will decide whether and how to investigate. The Designated Safeguarding Lead should be prepared to contribute to the strategy discussion.

8.7 The local authority should make a decision, within one working day of a referral being made, about the type of response that is required and should let the referrer know the outcome. The referrer should follow up if this information is not forthcoming. A record of each contact with Children's Social Care, including the name of the officer with whom the School has spoken, and the date and time of the call, should be kept. If after a referral the child's situation does not appear to be improving, the referrer should consider following local escalation procedures.

9. Duty to report concerns about the management of safeguarding

9.1 The School recognises that children cannot be expected to raise concerns in an environment where staff fail to do so. Staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the School's safeguarding regime, and feel confident that such concerns will be taken seriously by the senior leadership team. The duty to report concerns about the management of safeguarding is part of the Code of Conduct, and will also be reflected in staff training.

9.2 Where staff or volunteers reasonably believe that safeguarding concerns exist, or where they have concerns regarding the management of safeguarding issues, it is their duty to raise concerns.

9.3 The member of staff or volunteer should bring their concerns to the attention of the Designated Safeguarding Lead, or in a case where the concerns relate to the actions or inaction of the Designated Safeguarding Lead, to the Head. The concern will be investigated as a serious safeguarding issue, and action taken will be reported back to the member of staff as appropriate.

9.4 However, where someone reasonably believes these reporting routes to be inappropriate, or has reported concerns and no action has been taken, they should contact the Director of Legal and Risk Assurance at Trust Office, who will investigate the concern as a serious safeguarding issue and report action taken back to the member of staff as appropriate.

9.5 Where internal reporting would be inappropriate or has resulted in no action being taken, the member of staff should refer their concerns to local authority Children's Social Care directly, or use the NSPCC whistleblowing helpline (see section 11 below for contact details).

10. Monitoring and Review

10.1 The working of this Policy will be monitored locally by the Designated Safeguarding Lead in the School who will report as required to the Head.

10.2 The GDST, as proprietor of the School, will undertake an annual audit visit and other periodic checks in order to monitor the effectiveness of the School's implementation of these policies and procedures, together with a review of the safeguarding incidents that have arisen and how they were managed.

10.3 The annual review will be reported back to the GDST's Safeguarding Committee, which in turn reports to the Education and People Committee. These committees monitor safeguarding compliance. A member of the Safeguarding and Education and People Committees, who is also a member of the GDST Council, is nominated by Council as 'Safeguarding Lead' to take leadership responsibility for safeguarding at organisational level, delegating where appropriate to members of the Executive Leadership Team. The Health and Safety Committee will also consider the processes in place for promoting the welfare of GDST pupils.

10.4 The Girls' Day School Trust acknowledges its overall responsibility in ensuring that this Policy is effective in its implementation and meets all current regulatory requirements. An annual review of this Policy and associated procedures, and the efficiency with which associated duties have been discharged, will be undertaken so that any deficiencies or weaknesses can be remedied without delay.

10.5 This policy was last reviewed and updated on 23rd September 2026 and will be reviewed again in the event of any significant changes or by September 2027 at the latest. The School's most recent safeguarding audit visit took place on 19th & 20th May 2026.

11.1 Key Contacts

Headmistress: Emily Codling 0208 781 7000
Whole School Designated Safeguarding Lead: Taiana Hathway 0208 781 7031
Deputy Designated Safeguarding Lead (Senior School): Christina Bird 0208 781 7057
Designated Safeguarding Lead (Junior School and EYFS): Kelly Powell 0208 781 7096
Deputy Designated Safeguarding Lead (Junior School and EYFS): Claire Dickerson 0208 781 7071
Deputy Designated Safeguarding Lead (Junior School SENDCO): Sarah Stewart 0208 781 7071
School Safeguarding Governor: Charlie Spedding 0208 781 7000

11.2 Trust Office – 020 7393 6666 (tel) 020 7393 6789 (fax)

David Boyd (Director of Legal and Risk Assurance)
d.boyd@wes.gdst.net Tel: 020 7393 6649

Poppy Scott Plummer (GDST Council Safeguarding Lead)
c/o Lucy Colegate l.colegate@wes.gdst.net Tel: 020 7393 6666

Legal: LegalDepartmentTrustOffice@UK.GDST.NET Tel: 020 7393 6666
People & Culture: hrdepartment@wes.gdst.net Tel: 020 7393 6666
Education: educationteam@wes.gdst.net Tel: 020 7393 6666

11.3 Multi-agency contacts

- Gemma Taylor: Bromley Lead Officer (LADO) for Education Safeguarding 0208 461 7775
- Libby Kember: Educational Safeguarding Officer 0208 313 4665
- Bromley SCB: 0208 461 7816 (out of hours: 0300 303 8671 / 020 8464 4848)
- Bromley Multi Agency Support Hub (MASH): 0208 461 7373 /7309
- Bromley CAF team: 0208 461 7174
- Bexley Social services 020 8303 7777
- Kent Social Services 08458 247 100
- Lewisham Social Services 020 8314 6660 (Out of hours: 020 8314 6000)
- Croydon Social services 020 8726 6400
- Greenwich Social Care: 0208 921 3172 (extension 3 for MASH)
- Bromley Well Being Counselling Service: 0208 464 9033
- Bromley CAMHS: 0208 315 4430
- Bromley Phoenix Centre: 0208 466 9988
- Lewisham CAMHS: 0207 138 1250
- Education Welfare Service: 0208 313 4152
- Tracy Lewis (training, Bromley): 0208 461 7799
- Local Police (Bromley Police Station): 0300 123 1212/ 101
- Police (non-emergency) 101 (emergency) 999
- *Bromley Schools and Youth Co-ordinator Sergeant Joe Godwin Joe.Godwin@met.police.uk 07769426434*
- *Bromley Schools Team SNMailbox.SchoolsTeamBromley@met.police.uk*
- Bypass (alcohol and substance service) 020 8460 9952
- Young Minds: 0808 802 5544
- Prevent Duty Co-ordinator, Sandra Campbell: 020 8313 4638
- Bromley Children Project: 0208 461 7259

National contacts:

- NSPCC: help@nspcc.org.uk tel: 0808 800 5000
- NSPCC whistleblowing: help@nspcc.org.uk tel: 0800 028 0285
- NSPCC sexual abuse in schools helpline: help@nspcc.org.uk tel: 0800 136 663
- CEOP: www.ceop.police.uk/ceop-reporting/
- DfE dedicated telephone helpline and mailbox for non-emergency advice for staff and governors: 020 7340 7264 and counterextremism@education.gsi.gov.uk