



Coleridge Primary School

Safeguarding and Child Protection Policy

September 2026

Review date: September 2027

This policy has been reviewed and updated to reflect *Keeping Children Safe in Education 2026*, statutory guidance issued by the Department for Education and in force from 1 September 2026.

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1. Introduction

Coleridge Primary School is committed to a strong culture of safeguarding, ensuring that all staff embrace the concept of “it could happen here” and that they recognise that safeguarding is everyone’s responsibility. We are fully committed to creating a culture of vigilance. We expect everyone who works in and visits our school to share this commitment. We encourage staff, pupils, and visitors to report anything that concerns them, and we will always act in the best interest of the child.

Our pupils are taught how to stay safe, including when online, and to recognise when they may be at risk. We ensure our pupils know how to get help when they need it. In line with the latest *Working Together to Safeguard Children*, we place importance on contextual

safeguarding and consider risks in our local community when assessing the safety of our pupils.

Safeguarding and promoting the welfare of children is everyone's responsibility. We recognise that no single practitioner can have a full picture of a child's needs and circumstances. Staff are therefore expected to identify concerns, share information appropriately and take prompt action. Staff should maintain professional curiosity and recognise that abuse, neglect, exploitation and other safeguarding issues are rarely standalone events and may overlap.

The latest version of this policy is available on the school website and upon request.

2. Equality Statement

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

We give special consideration to children who:

- have special educational needs (SEN) or disabilities and health conditions;
- are young carers;
- may experience discrimination due to their race, ethnicity, religion, sex, sexual orientation or gender questioning;
- have English as an additional language;
- are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic abuse;
- are at risk of FGM, sexual exploitation, forced marriage, or radicalisation;
- are asylum seekers;
- are at risk due to either their own or a family member's mental health needs;
- are looked after or previously looked after;
- are missing from education;
- whose parent/carer has expressed an intention to remove them from school to be home educated;
- have a parent or carer in custody, or are affected by parental offending;
- are at risk of modern slavery or trafficking;
- have exhibited early signs of abusive, violent or harmful behaviour;
- are showing signs of being drawn into anti-social or criminal behaviour, including gang involvement or county lines;
- are repeatedly absent, frequently missing from education, or experiencing other attendance difficulties;
- are repeatedly removed from the classroom, have experienced multiple suspensions, are on a part-time timetable or are at risk of permanent exclusion;
- are pregnant and/or are parents themselves; or
- are privately fostered.

The school recognises that prejudice-based harm, including racism, faith-based prejudice and other forms of discrimination, can affect a child's welfare, wellbeing, mental health and willingness to seek help. Staff should be alert to these risks and ensure that concerns are considered within safeguarding practice where appropriate.

3. Definitions

In line with *Keeping Children Safe in Education 2026*, we define safeguarding and promoting the welfare of children 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 grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

Children includes everyone under the age of 18.

The school recognises that children may experience harm both within and outside their family. This includes extra-familial harm such as sexual abuse and exploitation, criminal exploitation, serious youth violence, county lines, teenage relationship abuse and radicalisation.

4. Key contacts

Name	Role	Contact details
Louise Foulkes	Designated Safeguarding Lead (DSL)	lfoulkes@coleridgeprimary.net
Leon Choueke	Deputy DSL	lchoueke@coleridgeprimary.net
Ben Strange	Deputy DSL	bstrange@coleridgeprimary.net
Tim Ibbotson	Deputy DSL	tibbotson@coleridgeprimary.net
Kirstie Henry	Deputy DSL	khenry@coleridgeprimary.net
Kirstie Henry	Designated Teacher for LAC and PLAC	khenry@coleridgeprimary.net
Ian Chapman	Safeguarding Governor	lchapman@coleridgeprimary.net
Haringey MASH (Multi Agency Support Hub)		Monday to Friday 9.00am to 5.00pm: 020 8489 4470. Out of hours: 020 8489 0000. Email: MashReferral@haringey.gov.uk

Name	Role	Contact details
Islington MASH (Multi Agency Support Hub)		020 7527 7400
Haringey LADO	Local Authority Designated Officer	020 8489 2968 / 07816 097223 / lado@haringey.gov.uk
Kirstie Henry	Virtual School	khenry@coleridgeprimary.net
Orlagh Creamer	SENCO	ocremer@coleridgeprimary.net
Kirstie Henry	Well Being Lead	khenry@coleridgeprimary.net
Debby Kuypers	Chair of Governors	dkuypers@coleridgeprimary.net

The Haringey MASH email address in this policy is **MashReferral@haringey.gov.uk**.

The Education Welfare Officer named in this policy is **Lanica Powell**.

We are part of Haringey local authority. We follow both Haringey and Islington multi-agency safeguarding arrangements, put in place by the safeguarding partners.

5. Roles and responsibilities

5.1 Designated Safeguarding Lead and deputies

The DSL will take lead responsibility for safeguarding with the support of the Deputy DSLs. The DSL will:

- be available during term time for staff to discuss any safeguarding concerns;
- lead on referrals to local authority children's social care, the Channel Programme where there is a radicalisation concern, the DBS where relevant in relation to allegations of abuse made against staff, and where a crime has been committed to the Police as required with reference to the guidance *NPCC – When to call the police*;
- act as a source of support, advice and expertise for all staff;
- act as a point of contact with the safeguarding partners and share information with them as required;
- liaise with the Headteacher, Leon Choueke, to keep them informed of issues, especially police investigations and ongoing enquiries under section 47 of the Children Act 1989;
- liaise with the case manager as required and the LADO for child protection concerns in cases which concern a staff member;
- liaise with relevant staff in school, e.g. SENCO, Wellbeing Lead, attendance lead, online safety providers etc.;
- promote engagement with parents and/or carers in safeguarding and promoting the welfare of children;

- take lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues of students and through identifying the impact these may have on attendance, engagement and achievement at school;
 - work with staff to ensure that the school knows the cohort of children who have or have had a social worker, their academic progress and attainment and maintain high aspirations for this cohort and support staff to enable these students to meet their potential;
 - ensure records are kept in line with good record-keeping practice as outlined in the latest *Keeping Children Safe in Education*;
 - ensure CP files are transferred to new schools within 5 days, ensuring safe transit and confirmation of receipt;
 - ensure that this policy and safeguarding procedures are accessible to all new and existing staff, that this is reviewed at least annually and is available publicly;
 - liaise with local safeguarding partners to ensure that staff are aware of any training opportunities and the latest local policies;
 - update training every two years covering the content outlined in KCSIE and ensure any Deputy DSLs also renew this training;
 - update own knowledge and skills at least annually;
 - work to understand the views of students and encourage a culture of listening to students;
 - hold and share information in line with data protection laws and the guidance around information sharing in KCSIE.
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- Ensure that robust arrangements are in place for safeguarding cover whenever the DSL is unavailable, including during absence, leave and other periods when the DSL cannot respond.
 - Ensure that staff know clearly who they should contact and how safeguarding concerns will be received and acted upon without delay.
 - Where appropriate, the school may use a confidential shared safeguarding mailbox or equivalent system to ensure that concerns are received, monitored and acted upon promptly.
 - Ensure that safeguarding information and concerns received during periods of DSL absence are reviewed promptly and that appropriate action is taken
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- Ensure that child protection files are kept up to date and that safeguarding records clearly distinguish between current concerns, historical information, observed facts and professional opinion where appropriate.
 - When transferring a child protection file to another school or college, ensure that it is transferred securely and within the timescales set out in this policy, together with a clear and structured summary identifying current safeguarding concerns, relevant context and ongoing support needs.
 - Consider whether relevant safeguarding information should be shared with the receiving school in advance of a transfer where this would assist in managing risk and supporting the child.

5.2 Governing body

The governing body will:

- review and approve this policy at each review and hold the Headteacher to account over its implementation;
- appoint a safeguarding governor to oversee safeguarding compliance and the effectiveness of this policy;
- read and understand *Keeping Children Safe in Education*, and review this guidance at least annually;
- engage with safeguarding training, including training at induction, that equips the governing body with the skills to provide strategic challenge in relation to safeguarding;
- review the filtering and monitoring system and processes to ensure compliance with *Keeping Children Safe in Education*.

The governing body will also:

- ensure that all staff, including staff who do not work directly with children, are provided with and required to read Part One of *Keeping Children Safe in Education* in full;
- ensure that mechanisms are in place to assist all staff to understand and discharge their safeguarding responsibilities;
- ensure that robust arrangements are in place for DSL cover;
- ensure that the school's child protection policy reflects the additional safeguarding barriers faced by children with SEND, disabilities, certain medical conditions and other vulnerabilities;
- ensure that filtering and monitoring provision is reviewed at least annually and that records of the review and checks are maintained;
- ensure that safeguarding policies, procedures and practice take account of the school's duties under the Public Sector Equality Duty.

5.3 All staff

All staff will:

- receive appropriate safeguarding and child protection training including online safety which, amongst other things, includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring;
- receive safeguarding updates regularly through staff meetings and team briefings and at least annually that provide the relevant skills and knowledge to safeguard children effectively;
- understand the local process for community-based Family Help and staff's role in relation to it;
- understand the circumstances in which children may benefit from universal services, community-based Early Help or targeted Family Help;

- understand the process for making referrals to local authority children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (child protection) that may follow a referral, along with the role they might be expected to play in such assessments, for example supporting the safeguarding team with collecting information for enquiries or multi-agency meetings;
- understand the criteria and local procedures for referral to children's social care where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm;
- know what to do if a child tells them they are being abused, exploited, or neglected and to maintain an appropriate level of confidentiality;
- know not to promise a child that they will not tell anyone about a report of any form of abuse;
- reassure victims that they are being taken seriously and assure them that they are not causing a problem by reporting;
- 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. This should not prevent professional curiosity and discussions with the DSL;
- know the indicators of abuse, neglect and exploitation and exercise professional curiosity and understand that such issues are rarely standalone ones;
- be aware of extra-familial and/or contextual risks which occur outside of families, e.g. sexual abuse, domestic abuse, criminal exploitation, serious youth violence, county lines and radicalisation;
- be aware that technology is a significant component in many safeguarding and wellbeing issues and the risks young people face online;
- understand that children may experience prejudice-based harm, including racism, faith-based prejudice and other forms of discrimination;
- know how to report concerns about safeguarding practices within the school via whistleblowing procedures or other means;
- know how to report concerns if staff have a safeguarding concern, or an allegation is made about another member of staff, including supply staff, trainee teachers, volunteers and contractors, harming or posing a risk of harm to children through the following process:
 - concerns or allegations about a member of staff, supply teacher, trainee teacher, volunteer or contractor should be reported to the Headteacher;
 - concerns about the Headteacher should be reported to the Chair of Governors;
 - where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff, including a supply teacher, trainee teacher, volunteer or contractor, to the Headteacher, report it directly to the local authority designated officer (LADO);
- read and understand **Part One of Keeping Children Safe in Education in full**, and review this guidance at least annually;
- attend and engage with induction training, including reading and understanding our:
 - Child Protection Policy;

- Behaviour Policy and the measures taken to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying;
- Staff Code of Conduct;
- safeguarding response to children who go missing from education.

The requirement to read Part One of KCSIE applies to **all staff, including staff who do not work directly with children**. The previous reference to the shorter Annex A/condensed version has been removed.

Staff should understand:

- when a child or family may benefit from community-based Early Help;
- when targeted Family Help may be appropriate;
- the local criteria and procedures for accessing Family Help;
- when concerns require referral to children's social care rather than waiting for Family Help; and
- their role in supporting children, families and other agencies following a referral.

Staff should be alert to the possibility that children may be experiencing multiple forms of harm at the same time. Where staff are unsure, they should always speak to the DSL or a Deputy DSL.

6. Responding to and recording concerns

When staff have a safeguarding concern, they should promptly contact the Safeguarding Team in person or by email (safeguardingteam@coleridgeprimary.net). When visitors to the school have a concern, they should contact the Safeguarding Team in person, by phone, 0208 340 3173 or contact the DSL by email (lfoulkes@coleridgeprimary.net). All staff should know what to do if a child tells them they are being abused, exploited, or neglected and to maintain an appropriate level of confidentiality. All staff should know to act upon concerns about a child's welfare immediately.

All staff should be aware of the following when responding to concerns:

- all staff should know not to promise a child that they will not tell anyone about a report of any form of abuse;
- all staff should be able to reassure victims that they are being taken seriously and assure them that they are not causing a problem by reporting;
- 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. This should not prevent professional curiosity and discussions with the DSL;
- all staff should be alert to prejudice-based harm, including racism, faith-based prejudice and other forms of discrimination;
- staff should be aware that safeguarding concerns may occur outside the family and outside school, including online.

If a member of staff is concerned by verbal conversations, disclosures, or signs of abuse, neglect or exploitation, these should immediately be recorded in writing and passed to the DSL. If the member of staff is unsure, they should always speak to the DSL or a deputy regarding their concerns.

The DSL will then decide what action must be taken, which can include:

- further well-being support in school;
- referral for community-based Early Help;
- referral for targeted Family Help;
- referral to children's social care;
- referral to other specialist agencies where appropriate.

If the DSL and deputies are not available, a staff member should not delay and should consider contacting local children's social care for advice or to make a referral:

- Haringey MASH: Monday to Friday 9.00am to 5.00pm: 020 8489 4470; out of hours: 020 8489 0000; email: MashReferral@haringey.gov.uk
- Islington MASH: 020 7527 7400

Any such action should be shared with the Safeguarding Team as soon as is practically possible.

Where there is immediate danger, or where a child is at immediate risk of harm, staff should contact the emergency services by calling 999 and then inform the DSL as soon as possible.

Parents should be aware that referrals can be made by the school where there is suspected abuse, neglect or exploitation and that our concerns regarding a student will be shared. The school will normally seek to share these concerns and the referral with parents/carers first, unless to do so would put the child at greater risk of harm, where we are advised not to, or where it has not been practicable to do so.

Reporting and Recording concerns

At Coleridge Primary School, staff report their concerns by:

- immediately speaking to the DSL or one of the Deputy DSLs to alert them to the fact a disclosure has taken place;
- providing first-hand a summary of their concern or detail of a disclosure they have received in-person and then on the school's safeguarding portal – My Concern. They will use professional language and try to capture the incident as it took place or as it was described to them.

The safeguarding team will ensure that any action taken, or outcome is accurately recorded in line with good record-keeping guidance which should follow:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;

- a note of any action taken, decisions reached and the outcome;
- the rationale for the action taken including where a decision to refer, or not to refer, to external agencies has been made.

Records should distinguish, where appropriate, between:

- information directly observed or disclosed;
- professional opinion or interpretation;
- action taken;
- decisions made and their rationale; and
- current and historical safeguarding information.

Children can confidently report concerns knowing that these concerns will be treated seriously, and that they can express their views and give feedback too. This can be done through a variety of means, which include talking to one of their trusted adults or a member of the school Safeguarding Team.

7. Online safety

We recognise that the use of technology has become a significant component of many safeguarding issues, including child-on-child abuse. We recognise that children need to be safeguarded from potentially harmful and inappropriate online material and the school's role within this.

In line with relevant Department for Education guidance, we teach children about online safety and harms. Our teaching covers the underpinning knowledge and behaviours that can help pupils to navigate the online world safely and confidently regardless of the device, platform or app. These skills are explicitly covered in Computing and PSHE, and implicitly throughout the whole curriculum.

Teachers address online safety and appropriate behaviour in an age-appropriate way that is relevant to their children's lives, including:

- how to evaluate what they see online;
- the risks posed by social media platforms;
- how to recognise techniques used for persuasion;
- unacceptable online behaviour;
- how to identify online risks;
- how and when to seek support;
- how elements of online activity could adversely affect a pupil's personal safety or the personal safety of others online;
- how elements of online activity can adversely affect a pupil's wellbeing.

The school recognises that artificial intelligence, including generative AI and AI-enabled chatbots, can create additional safeguarding risks. These include exposure to harmful or inappropriate content, manipulation, exploitation, misinformation, harmful interactions and the creation or sharing of digitally altered or wholly AI-generated sexualised images.

The school will consider the safeguarding implications of AI when reviewing its online safety arrangements, filtering and monitoring provision, curriculum and staff training. Staff should report safeguarding concerns arising from children's use of AI to the DSL in accordance with this policy.

Our approach to online safety is framed by four main areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful content, for example pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation and conspiracy theories;
- **contact:** being subjected to harmful online interaction with other users; for example, peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including the making or sharing of nudes and semi-nudes, online bullying, harassment and abusive or misogynistic/misandrist behaviour;
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

The term "making or sharing nudes and semi-nudes" includes images taken by the child themselves, taken or created by another person, digitally altered images and images wholly or partly generated using artificial intelligence, including so-called "deepfakes" or "deep nudes".

To address the risks above, as a school we will:

- teach students about online safety through Computing and PSHE lessons and other relevant subjects;
- inform parents about what their child is being asked to do online by the school;
- train all staff on online safety, including filtering and monitoring;
- train all staff in online safety, including at induction;
- ensure the Safeguarding Team liaises with staff on matters of online and digital safety, and when deciding upon a referral to the relevant agencies;
- consider the safeguarding implications of children's use of generative AI and other AI-enabled technology.

For further detail, please refer to the Online Safety Policy.

Acceptable use of technology and use of smart and mobile technology

We recognise that many children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means some children, whilst at school, can sexually harass, abuse, bully or control their peers via their mobile and smart technology, share indecent images consensually and non-consensually, and view and share pornography and other harmful content.

To manage this and reduce risk, we have clear guidance for our school community on acceptable use of technology and the use of mobile phones and smart technology:

“Pupils are not permitted to bring any personal mobile device into school. This includes mobile phones, tablets and laptops, and any other smart tech with the functionality to connect to the internet and/or take photographs.

If a personal mobile device is discovered in school, then staff are instructed to confiscate it, notify the child’s parent/carer that they have done so, and request that the parent/carer collect the device from the staff member at the end of the school day.

The Headteacher, and any member of staff authorised to do so by the Headteacher, can carry out a search and confiscate any electronic device that they have reasonable grounds for suspecting:

- poses a risk to staff or pupils; and/or
- is evidence in relation to an offence.

Our Staff Code of Conduct outlines what we expect from staff in relation to use of mobile and smart technology, social media, and acceptable online communication.

For further detail, please refer to the Online Safety Policy.

Filtering and monitoring

For filtering, Coleridge Primary School uses School Protect, from London Grid for Learning (LGfL). This filters out inappropriate content and monitors access to restricted content, or content which may be of concern. This covers our whole school network and any guest devices which may connect to it.

For monitoring, Coleridge Primary School uses SENSO, also provided by LGfL. This monitors what is being accessed on all school devices and provides real-time alerts to the DSL, if a safeguarding concern is identified. The DSL will then take appropriate action, including, when appropriate, logging any alerts flagged on My Concern, and referring to children’s social care when necessary.

Where devices are loaned to children to be taken out of school, they are covered by HomeProtect, also by London Grid for Learning.

The DSL has lead responsibility for understanding the filtering and monitoring systems and processes in place.

The school will ensure that a member of the senior leadership team with responsibility for filtering and monitoring, supported by the DSL and relevant IT support, reviews the effectiveness of filtering and monitoring provision at least once every academic year. The review will:

- include checks that filtering is working appropriately on all internet-connected devices in all relevant locations;
- include consideration of the age and range of children, those potentially at greater risk of harm and how often children access the IT system;
- ensure that relevant staff understand the provisions in place and know how to escalate concerns;
- result in a written record of the checks undertaken and any actions arising.

The DSL and deputies monitor the effectiveness of this system through an annual review with the Network Manager and Online Safety Lead, as part of our wider Online Safety Review.

The school takes care not to over-block content so that there are not unreasonable restrictions on what students can be taught regarding online safety. The processes we have in place have been informed by our risk assessment as required by the Prevent Duty.

The Department for Education filtering and monitoring standards set out that schools should:

- identify and assign roles and responsibilities to manage filtering and monitoring systems;
- review filtering and monitoring provision at least annually;
- block harmful and inappropriate content without unreasonably impacting teaching and learning;
- have effective monitoring strategies in place that meet their safeguarding needs.

At Coleridge Primary School, we have done the following in relation to this:

- identified our DSL as the person responsible for ensuring the standards are met;
- identified London Grid for Learning as our Internet Service Provider and provider of the technical filtering and monitoring solutions;
- identified our Network Manager as responsible for managing the day-to-day application of the solutions;
- instigated a review of our filtering and monitoring solutions at least annually as part of our wider Online Safety Review;
- maintain records of the checks undertaken as part of the annual review;
- continue to adapt our filtering and monitoring solutions as required.

For more information on filtering and monitoring, parents and carers can contact our DSL, Louise Foulkes, by emailing our school office admin@coleridgeprimary.net.

For further detail, please refer to the Online Safety Policy.

8. Allegations Against Staff and Whistleblowing

At Coleridge Primary School, we recognise that adults working in a school may cause harm, including agency staff, trainee teachers, visitors, volunteers, contractors and governors. Any concerns about a member of staff posing a risk of harm to children should immediately be referred to the Headteacher (see Appendix 3).

These concerns could include where anyone working in the school has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children;
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

These procedures apply to concerns or allegations involving staff members, supply teachers, trainee teachers, volunteers and contractors.

Where an individual is supplied or placed in the school by a third-party organisation, the school and the organisation share safeguarding responsibilities. The school will liaise with the relevant organisation and the LADO as appropriate and will not leave the management of a safeguarding concern solely to the third-party organisation.

Where the concern relates to a trainee teacher, the school will liaise with the relevant training provider as appropriate, while retaining responsibility for ensuring that the safeguarding concern is appropriately reported, assessed and managed.

Where there are concerns about the Headteacher, these should be referred to our Chair of Governors, Debby Kuypers – dkuypers@coleridgeprimary.net.

If you have concerns around safeguarding procedures and systems in the school, please refer to our whistleblowing policy. The NSPCC whistleblowing helpline can also be contacted via telephone (0800 028 0285).

9. Children potentially at greater risk of harm

At Coleridge Primary School, we recognise that children with social workers may potentially be at greater risk of harm and need further support. Children may need this support due to abuse, neglect or complex family circumstances. Our staff are aware that these students may face additional barriers to their attendance, learning or behaviour. We take these needs into account and liaise regularly with the relevant social worker to put appropriate support in place.

We also recognise that low or erratic attendance and unexplainable and/or persistent absences from education may be an indicator of abuse, neglect or exploitation.

All staff should be aware that children being absent from school, particularly repeatedly and/or for prolonged periods, and children missing education, can act as a vital warning sign of a range of safeguarding possibilities which may include abuse, neglect, sexual abuse, exploitation, child criminal exploitation, county lines involvement, mental health problems, risk of substance misuse, so-called 'honour'-based violence.

We know that early intervention is essential to help prevent the risks of a child going missing in the future. Our pastoral teams track attendance thoroughly, addressing concerns without delay and liaising with our Attendance Lead, Tim Ibbotson and our Education Welfare Officer (EWO), **LaNica Powell**, where needed.

We ensure that pupils who are expected to attend the school, but fail to take up the place or cannot be located, are referred to the local authority in line with local procedures and guidance such as *Children Missing Education*. The DSL will be aware of any students who may be considered CME and will work with the Attendance Lead, Tim Ibbotson or the Education Welfare Officer (EWO), LaNica Powell, to ensure any safeguarding concerns are reviewed, the advice of external agencies is sought, and local procedures are followed. We also strongly encourage parents to supply us with two emergency contacts for their child, updating their contact details without delay if they are changed and share our procedures for how to notify the school of an absence with all parents. When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

The school is alert to the needs of young carers, recognising that caring responsibilities can affect attendance, attainment, behaviour and wellbeing. We will seek to identify young carers early and ensure they receive support at the right time and from the appropriate services, including external partners and local authority or health services where appropriate.

Children who are lesbian, gay or bisexual

Children who are lesbian, gay or bisexual are not, in themselves, at greater risk of harm because of their sexual orientation. However, they can sometimes be vulnerable to discriminatory bullying. Children who are perceived by other children to be lesbian, gay or bisexual, whether they are or not, can be similarly vulnerable.

The school will take steps to prevent and respond to bullying, harassment and discriminatory behaviour and will provide a safe environment in which children can report concerns.

Children who are questioning their gender

Children who are questioning their gender may experience vulnerabilities including bullying, discrimination, complex mental health or psychosocial needs and difficulties within relationships with family, peers or the wider community.

The school will not initiate action regarding a child questioning their gender. Where a child or parent/carer raises a request relating to social transition, the school will respond

in accordance with current *Keeping Children Safe in Education* guidance, safeguarding duties, equality and human rights law and the school's relevant policies. Any request for support with social transition will be considered carefully and on an individual basis. The school will:

- consider the best interests and welfare of the child and other children affected;
- consider the child's individual circumstances and wider needs;
- involve the DSL where appropriate;
- involve parents/carers as a matter of priority, unless doing so would create a greater safeguarding risk to the child;
- consider relevant clinical or professional advice where appropriate;
- document decision-making and retain appropriate records; and
- take steps to prevent and respond to bullying, harassment and discrimination.

As a primary school, we will exercise particular caution in relation to requests for support with full social transition and will consider the current DfE guidance carefully in each individual case.

A child who talks to a member of staff about their feelings but does not ask the school to make changes to how they are treated should be supported sensitively. There is no reason to break confidence unless there is a related safeguarding risk. Where a conversation raises concerns about wellbeing or safety, the school's usual safeguarding procedures will be followed.

Children with special educational needs, disabilities or certain medical conditions

Children with SEND, disabilities or certain medical or physical health conditions can face additional safeguarding barriers when recognising abuse, neglect or exploitation. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability or condition without further exploration;
- being more prone to peer group isolation than other children;
- the potential for children with SEND and certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing signs;
- communication barriers and difficulties in managing or reporting concerns;
- not understanding that what is happening to them is abuse;
- dependence on adults for care or intimate care;
- isolation from others;
- cognitive difficulties in understanding the difference between fact and fiction in online content and the consequences of repeating content or behaviours.

Any reports of abuse involving children with SEND will require close liaison between the DSL or Deputy DSL and the SENCO.

The school will consider additional pastoral support and attention for these children and ensure that appropriate communication support is in place.

The school recognises that children with medical conditions may have additional safeguarding vulnerabilities.

An incident relating to the management of a child's medical condition, including allergies, does not in itself warrant a safeguarding referral. A referral would be appropriate where the incident raises concerns that the child may be at increased risk of neglect, abuse or exploitation because of their medical condition.

For example, this may occur where relevant information about a child's medical condition is not provided to the school, or where a child is repeatedly sent to school without essential medication, thereby putting the child at risk.

At Coleridge Primary School, we identify students who may be more at risk of harm and take action to ensure their safety, including: Well-being Reviews, Teacher reviews, SEND reviews, ELSA sessions, counselling sessions, Nurture Hub playtime support and additional SEND specialist provision – Rainbow Class.

For further detail please refer to the SEND Policy and Positive Handling Policy, which makes clear the procedures for safe use of reasonable force in incidents where physical intervention may be necessary.

10. Records and information sharing

We recognise the importance of information sharing between practitioners and local agencies. We are proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.

Our safeguarding records include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, a rationale for the action, decisions reached and the outcome.

Throughout this policy, "data protection laws" refers collectively to:

- the Data Protection Act 2018;
- the UK General Data Protection Regulation (UK GDPR); and
- the Data (Use and Access) Act 2025.

We understand that data protection laws place duties on organisations and individuals to process personal information fairly and lawfully and to keep information safe and secure. At Coleridge Primary School, we understand that data protection laws do not prevent the sharing of information for the purposes of keeping children safe.

Staff should share information where there is a lawful basis for doing so and where sharing is necessary and proportionate to safeguard and promote the welfare of a child. Where a decision is made to share information, or not to share information, the DSL or appropriate safeguarding professional should record the rationale where this is significant to the safeguarding decision.

Where information is shared, staff should consider:

- whether the information is necessary and proportionate;
- who needs to receive the information;
- whether sharing could increase risk to the child;
- the relevant safeguarding context;
- the child's wishes and feelings where appropriate; and
- the need to maintain confidentiality and information security.

In line with our mandatory duty, Coleridge Primary School will notify our local authority if we become aware of any private fostering, to allow the local authority to check the arrangement is suitable and safe for the child.

Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home.

Where a private fostering arrangement comes to the attention of the school, the school will notify the local authority in accordance with the relevant local procedures. Where the school is involved in arranging the private fostering arrangement, the local authority will be notified as soon as possible after the arrangement has been made.

11. Site safety

All staff members have a responsibility to ensure the buildings and school site are secure and to report any concerns that may occur.

The school will not accept the behaviour of any individual, parent identity of all visitors and volunteers coming into school is checked. Visitors are expected to sign in and out and to display a visitor's badge while on the school site. Any individual who is not known or identifiable will be challenged for clarification and reassurance by our staff.

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

The school will ensure that safeguarding and security arrangements work together to provide a safe environment for children and staff, including consideration of risks arising from serious violence and other security-related incidents.

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

In line with our strong commitment to safeguarding, at Coleridge Primary School, we believe that all children have a right to learn in a safe environment and take a whole-school approach to child-on-child abuse which includes preventative work, appropriate responses, and a zero-tolerance approach to abuse.

Our staff recognise that children of any age or gender can be capable of abusing other children, which can happen both inside and outside of school and online. This behaviour will be dealt with in line with our Behaviour Policy.

Child-on-child abuse is a safeguarding issue for both the child who has experienced the harm and the child alleged to have caused the harm.

Children who display harmful behaviour may themselves have experienced abuse, neglect, exploitation or other adversity and should be considered for appropriate safeguarding support.

Child-on-child abuse is preventable and may involve serious physical harm, threats, intimidation, coercion, exploitation or the use or threat of weapons. It may occur within school, outside school or online.

Staff should be alert to the possibility that child-on-child abuse may be occurring even where there have been no previous reports. The absence of reports should not be interpreted as evidence that such behaviour is not occurring.

This child-on-child abuse can include, but is not limited to:

- bullying, including cyberbullying, prejudice-based and discriminatory bullying;
- abuse in intimate personal relationships between children, also known as teenage relationship abuse;
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and harassment;
- harmful sexual behaviour;
- causing someone to engage in sexual activity without consent;
- consensual and non-consensual making or sharing of nudes and semi-nudes;
- digitally altered or AI-generated sexual images, including deepfakes or deep nudes;
- 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;
- initiation-type violence and rituals;
- online abuse, including abusive, harassing, misogynistic or misandrist messages;

- the sharing of abusive images or pornography with someone who does not want to receive such content.

All the above are examples of abuse and should never be tolerated or passed off as “banter,” “just having a laugh”, “boys will be boys” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

We recognise that the gendered nature of child-on-child abuse makes it more likely that girls will be victims and boys perpetrators, but all reports will be taken seriously. All concerns should be passed onto the DSL or a deputy.

We minimise the risk of child-on-child abuse through our extensive PSHE curriculum and pastoral programmes, including assemblies and other key messages. All staff understand the importance of challenging inappropriate behaviours between peers and their role in preventing and responding to child-on-child abuse.

Our staff understand that even if there are no reports of child-on-child abuse in our school, it does not mean child-on-child abuse is not happening – it may be the case that it is just not being reported.

Children can report any child-on-child abuse by talking to one of their identified trusted adults, or a member of the safeguarding team.

The school recognises that harmful sexual behaviour exists on a continuum and can range from developmentally inappropriate sexualised behaviour through to sexual harassment and sexual violence.

The school will respond proportionately and in a way that takes account of the age and developmental stage of the children involved. Behaviour which may be developmentally inappropriate, harmful or abusive will be considered within safeguarding procedures and appropriate support will be provided.

Any cases of child-on-child abuse will be thoroughly investigated, with the victim always being taken seriously and both the victim and alleged perpetrator given appropriate support.

Support will take the child’s wishes into account and may include increased pastoral support, sessions with one of our school ELSAs, access to counselling and a referral to external services.

We will liaise with the police and children’s social care as necessary.

Where there has been a report of sexual violence, an immediate risk assessment will be made, considering the needs of the victim, the alleged perpetrator, and our other pupils.

All allegations of child-on-child abuse will be recorded in our safeguarding files.

In cases where nudes or semi-nudes have been made or shared, the school will follow current DfE and UK Council for Internet Safety guidance.

All incidents involving the making or sharing of nudes or semi-nudes require a safeguarding response, whether the sharing appears consensual or non-consensual. Images may include photographs, videos, livestreams, digitally altered images and images wholly or partly generated using artificial intelligence.

Staff must report concerns to the DSL and must not view, copy, save, forward or otherwise distribute images unless specifically directed to do so as part of an appropriate safeguarding or law-enforcement response.

We record these incidents in line with our normal record-keeping process. Staff must record their concern, or the disclosure, using MyConcern.

Appendix 1: Types of abuse and safeguarding concerns

KCSIE identifies four main categories of abuse:

Physical abuse

Physical abuse is 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 of, or deliberately induces, illness in a child.

Emotional abuse

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

It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction.

It may involve seeing or hearing the ill-treatment of others, and seeing, hearing or experiencing domestic abuse and its effects.

It may involve serious bullying, including cyberbullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Emotional abuse may also involve persistent criticism, belittling or name-calling.

Sexual abuse

Sexual abuse involves forcing, causing or inciting a child to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening.

The activities may involve physical contact, including assault by penetration or non-penetrative acts such as masturbation, kissing, rubbing and touching over or outside clothing.

They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

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

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

Neglect

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, 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; or
- ensure access to appropriate medical care or treatment.

Other safeguarding concerns

There are a number of other safeguarding concerns that all staff need to be aware of. These are detailed further in Annex A of KCSIE, which all staff should read.

Child Criminal Exploitation (CCE)

Child Criminal Exploitation occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity:

- in exchange for something the victim needs or wants; and/or
- for the financial or other advantage of the perpetrator or facilitator; and/or
- through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE can also occur through the use of technology.

Some indicators of CCE include:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late;
- children experiencing financial exploitation.

County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas, using dedicated mobile phone lines or another 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, sexual violence and weapons to ensure compliance of victims.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnapping towards victims and their families if they attempt to leave the county lines network.

Serious violence

Serious violence is where children are involved with serious violent crime. Indicators 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;
- signs of assault or unexplained injuries.

There are a range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Child Sexual Exploitation (CSE)

Child Sexual Exploitation occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity:

- in exchange for something the victim needs or wants; and/or
- 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. Indicators can be similar to the indicators of CCE, as well as:

- referring to older children or adults as “boyfriends” or “girlfriends”; and
- children who suffer from sexually transmitted infections or become pregnant.

Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour.

Exploitation can take many forms, including:

- sexual exploitation;
- forced labour;
- slavery;
- servitude;
- forced criminality; and
- the removal of organs.

Staff should be alert to indicators that a child may be being trafficked or exploited and should discuss concerns promptly with the DSL.

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child.

Child abduction can be committed by parents or other family members, by people known but not related to the victim, such as neighbours, friends and acquaintances, and by strangers.

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either “cyber-enabled” or “cyber-dependent”.

Cyber-dependent crimes include:

- unauthorised access to computers, for example accessing a school’s computer network to look for test paper answers or change grades awarded;
- denial of Service (DoS or DDoS) attacks or “booting”; and
- making, supplying or obtaining malware such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offences.

Staff should be alert to the wider national and safeguarding risks associated with cybercrime and should report concerns involving children to the DSL.

Domestic abuse

The Domestic Abuse Act 2021 defines domestic abuse as any of the following behaviours, either as a pattern of behaviour or as a single incident, between two people over the age of 16 who are personally connected to each other:

- physical or sexual abuse;
- violent or threatening behaviour;
- controlling or coercive behaviour;
- economic abuse; and
- psychological, emotional or other abuse.

Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background. Domestic abuse can take place inside or outside of the home.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.

Exposure to domestic abuse can have a serious, long-lasting emotional and psychological impact on children and children are recognised as victims and not merely witnesses where domestic abuse occurs.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as “teenage relationship abuse”.

Depending on the age of the young people, this may not be recognised in law under the statutory definition of domestic abuse if one or both parties are under 16. However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Operation Encompass

Operation Encompass is an information-sharing scheme between the police and education settings.

A statutory duty was placed on the police in November 2025 to notify a child's education setting where they have reasonable grounds to believe a child may be a victim of domestic abuse.

Notifications may relate to children connected to a household where a domestic abuse incident has taken place, including where the child was not physically present at the incident.

At Coleridge Primary School, Operation Encompass notifications will be received and managed by the DSL or an appropriately designated member of the safeguarding team.

The information will be treated as confidential, stored securely and handled in accordance with data protection laws.

Operation Encompass does not replace normal safeguarding procedures. Where there are concerns about a child's welfare, the school will follow its normal safeguarding and referral procedures.

Homelessness

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

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property.

It should also be recognised that 16- and 17-year-olds could be living independently from their parents or guardians, for example through exclusion from the family home, and will require a different level of intervention and support.

Honour-based abuse (HBA)

Honour-based abuse encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage and practices such as breast ironing.

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

All forms of HBA are abuse, regardless of the motivation, and should be handled and escalated as such.

Forced marriage

Forcing a person into a marriage is a crime in England and Wales.

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

Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used.

Female Genital Mutilation (FGM)

FGM covers all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs.

It is illegal in the UK and is a form of child abuse with long-lasting harmful consequences. Section 5B of the Female Genital Mutilation Act 2003 places a statutory duty upon teachers to report to the police where they discover that FGM appears to have been carried out on a girl under 18.

It will be rare for teachers to see visual evidence, and they should not be examining pupils. If a victim discloses that FGM has been carried out on them, teachers must personally report to the police.

The duty does not apply in relation to at-risk or suspected cases – these should be discussed with the DSL, in line with our referral process.

Potential risk factors may include:

- a female child is born to a woman who has undergone FGM;
- a female child has an older sibling or cousin who has undergone FGM;
- a woman/family believe FGM is integral to cultural or religious identity;
- a parent or family member expresses concern that FGM may be carried out on the girl;
- a girl talks about FGM in conversation;
- being taken on a long holiday to a country where FGM is prevalent.

Radicalisation

We recognise that children are vulnerable to extremist ideology and radicalisation. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection.

Our school adheres to the Prevent duty and has “due regard to the need to prevent people from being drawn into terrorism”.

We build pupils' resilience to radicalisation by providing a safe environment for debating controversial issues and promoting fundamental British values.

Staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection.

Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include the DSL or Deputy DSL making a Prevent referral.

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes;
- glorifying or advocating violence, especially towards other faiths or cultures;
- intolerance of difference, including faith, culture, gender, race or sexuality.

In England, the Prevent duty complements schools' other responsibilities for ensuring that speakers do not undermine the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.

As part of managing the risk of radicalisation, we have clear protocols for ensuring that any visiting speakers, whether invited by staff or by children themselves, are suitable and appropriately supervised.

Mental health

All staff at Coleridge Primary School are 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.

Where staff have a mental health concern about a child that is also a safeguarding concern, they should contact the DSL or a Deputy DSL and report and record their concerns in line with this policy.

Staff should recognise that mental health difficulties may occur alongside other safeguarding concerns and should consider the wider context of a child's circumstances rather than assuming that a change in behaviour or wellbeing is solely a mental health issue.

Appendix 2 – Safer recruitment

Our single central record (SCR) records information on the checks carried out on staff and volunteers. Copies of these checks, where appropriate, will be located in individuals' personnel files.

We follow the guidance from *Keeping Children Safe in Education* and best practice, as outlined below.

New staff

When appointing new staff, we will:

- verify a candidate's identity, including checking the name on a birth certificate where this is available;
- obtain, via the applicant, an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity;
- obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available;
- verify the candidate's mental and physical fitness to carry out their work responsibilities;
- verify the person's right to work in the UK;
- if the person has lived or worked outside the UK, make any further checks the school considers appropriate;
- verify professional qualifications, as appropriate;
- ensure a candidate to be employed to carry out teaching work is not subject to a prohibition order issued by the Secretary of State;
- check that a person taking up a management position is not subject to a section 128 direction made by the Secretary of State;
- seek two references, including from the current employer, before interview and ask specific questions about the suitability of the candidate to work with children;
- ensure that appropriate checks are made to ensure that individuals are not disqualified under the Childcare (Disqualification) Regulations 2018;
- conduct online searches on shortlisted candidates, reviewing publicly available material for any incidents or issues and notify applicants of this process.

Agency and third-party staff

For agency and third-party staff, we will include written confirmation that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, the date the confirmation was received and whether an enhanced DBS certificate check has been provided.

The school recognises that safeguarding responsibilities are shared between the school and third-party organisations. We will ensure that safeguarding concerns relating to agency,

supply or contracted staff are managed appropriately and, where necessary, in consultation with the LADO and the supplying organisation.

Trainee/student teachers

Where applicants for initial teacher training are salaried by the school, we will carry out all necessary checks.

Where trainee teachers are fee-funded, we will ensure that the training provider has carried out the necessary checks and obtain written confirmation that these checks have been carried out.

Where a safeguarding concern or allegation arises about a trainee teacher, the school will follow its normal safeguarding and allegations procedures and will liaise with the relevant training provider as appropriate.

Existing staff

If we have any concerns about an existing member of staff's suitability to work with children, we will carry out the relevant checks as if the member of staff were a new member of staff.

If a member of staff moves from a post that is not in regulated activity to a post in regulated activity, we will ensure the relevant checks for that regulated activity have been carried out. This requirement also applies where a volunteer moves into a role that is regulated activity. We will follow our legal duty to refer to the DBS if a member of staff or volunteer has harmed, or poses a risk of harm, to a child or vulnerable adult where the relevant statutory criteria are met.

This includes where:

- the harm test is satisfied in respect of that individual;
- the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence; and/or
- the individual has been removed from working, paid or unpaid, in regulated activity, or would have been removed had they not left.

Volunteers

The Crime and Policing Act 2026 has removed the previous supervision exemption from the definition of regulated activity with children.

The school will therefore assess the actual duties and frequency of each volunteer's role to determine whether the volunteer is engaging in regulated activity.

A person will be engaging in regulated activity with children where they meet the relevant statutory definition. This includes volunteering in a school in a role involving teaching, training, instructing, caring for or supervising children frequently, on more than three days in a 30-day period or overnight.

Where a volunteer is engaging in regulated activity, the school will obtain an enhanced DBS certificate including children's barred list information.

Where a volunteer is not engaging in regulated activity, the school will undertake an appropriate risk assessment to determine whether an enhanced DBS check should nevertheless be obtained and will retain a record of that decision.

No volunteer will be permitted to undertake duties that require a barred list check until the appropriate checks have been completed.

Where an existing volunteer's role becomes regulated activity because of the change in legislation, the school will ensure that the appropriate enhanced DBS check including children's barred list information is obtained.

Where a volunteer meets the frequency/period condition through volunteering across multiple settings, the school will liaise with the other settings as appropriate to determine arrangements for obtaining and sharing the relevant DBS information.

Governors

All governors will have an enhanced DBS check without barred list information. A barred list check will be completed if a governor is engaging in regulated activity.

All governors will also have a Section 128 check where required.

Contractors

We will ensure that any contractor whose work provides them with the opportunity for contact with children will have the appropriate checks.

Those contractors engaging in regulated activity will have an enhanced DBS check including barred list information.

For all other contractors who are not engaging in regulated activity, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check will be required where appropriate.

If the contractor is engaged in regulated activity then an enhanced DBS check with children's barred list information will be required.

Barred list information will not be requested for a person who is not engaging in or seeking to engage in regulated activity.

Appendix 3 – Statement of procedures for dealing with allegations of abuse against staff

If you have a concern about the management of an allegation or that your concern has not been taken seriously then you should utilise the whistleblowing policy and procedures as set out in this policy.

This appendix applies to all cases where it is alleged that a staff member, supply teacher, trainee teacher, volunteer or contractor has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

We will deal with any allegation of abuse against a member of staff, supply teacher, trainee teacher, volunteer or contractor quickly, in a fair and consistent way that provides effective protection for the child and supports the person who is the subject of the allegation.

We recognise our duty of care to our employees and will provide effective support for anyone facing an allegation, including a named contact if the person is suspended, and access to our school counselling service.

We will advise staff to contact their trade union representative.

Allegations of abuse against staff should be reported to the Headteacher without delay. Where the concern is about the Headteacher this should be reported to Chair of Governors, Debby Kuypers (dkuypers@coleridgeprimary.net).

If the member of staff perceives there to be a conflict of interest, they can refer directly to the LADO. The contact details are available in the key contacts.

Where the concern relates to a trainee teacher, the school will liaise with the relevant training provider as appropriate. The school retains responsibility for ensuring that the safeguarding concern is appropriately reported, assessed and managed.

Where the concern relates to a supply teacher, contractor or other person supplied by a third-party organisation, the school will liaise with that organisation as appropriate. Safeguarding responsibility is shared and will not be delegated entirely to the third party. The following definitions will be used when determining the outcome of any investigation:

- **Substantiated:** there is sufficient evidence to prove the allegation.
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.
- **False:** there is sufficient evidence to disprove the allegation.
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Initial consideration when dealing with an allegation

The Headteacher or the Chair of Governors, where the Headteacher is the subject of an allegation, should discuss the allegation immediately with the local authority designated officer.

The Headteacher or the Chair of Governors as outlined above will be the case manager and lead any investigation.

This discussion will consider the nature, content and context of the allegation and agree a course of action.

There may be situations when the case manager will want to involve the police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.

Where there is no such evidence, the case manager will discuss the allegations with the designated officer in order to help determine whether police involvement is necessary. The case manager will inform the accused person about the allegation as soon as possible after consulting the designated officer.

Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies. If the initial sharing of information leads to a decision that no further action is to be taken in regard to the individual facing the allegation or concern, this decision and a justification for it will be recorded by both the case manager and the designated officer, and agreement reached on what information should be put in writing to the individual concerned and by whom.

The case manager will then consider with the designated officer what action should follow both in respect of the individual and those who made the initial allegation.

If the allegation is about physical contact, the strategy discussion or initial evaluation will take into account that school staff are entitled to use reasonable force to control or restrain children in certain circumstances.

Where it is clear that an investigation by the police or children's social care services is unnecessary, or the strategy discussion or initial evaluation decides that is the case, the designated officer will discuss the next steps with the case manager.

In those circumstances, the options open to the school or college depend on the nature and circumstances of the allegation and the evidence and information available.

This will range from taking no further action to dismissal or a decision not to use the person's services in future.

Suspension will not be the default position: an individual should be suspended only if there is no reasonable alternative.

In some cases, further enquiries will be needed to enable a decision about how to proceed. If so, the case manager will discuss with the designated officer how and by whom the investigation will be undertaken.

In straightforward cases, the investigation should normally be undertaken by a senior member of our staff.

In other circumstances, the allegation will require an independent investigator.

Parents or carers of the child or children involved will be told about the allegation as soon as possible if they do not already know of it.

However, where a strategy discussion is required, or police or children's social care services need to be involved, the case manager will not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers.

Parents or carers will be kept informed about the progress of the case.

Parents will be reminded of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing.

If parents or carers wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice.

The welfare of the child will be considered by the case manager in conjunction with the Designated Safeguarding Lead.

The DSL will lead on safeguarding the child and supporting their welfare throughout, including liaison with local safeguarding partners where required.

If necessary, the DSL will complete a risk assessment for the child.

The school has a duty of care to anyone accused of an allegation.

At Coleridge Primary School we support those accused by advising them to seek support from the LA and their union, if they belong to one.

If the accused person resigns, or ceases to provide their services, this will not prevent an allegation being followed up.

We will ensure that a referral to the DBS is made where the statutory criteria are met.

We will also consider whether a referral to the Secretary of State is appropriate.

Following a criminal investigation or prosecution, the police should inform the school and designated officer immediately when a criminal investigation and any subsequent trial is complete, or if it is decided to close an investigation without charge, or not to continue to prosecute the case after the person has been charged.

In those circumstances, the case manager will discuss with the designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed.

If the allegation is substantiated and the person is dismissed or the person's services are no longer used, or the person resigns or otherwise ceases to provide their services, the designated officer will discuss with the case manager and their personnel adviser whether the school will decide to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

In the case of a member of teaching staff, the case manager and personnel officer will discuss with the designated officer whether to refer the matter to the appropriate teaching regulation authority to consider prohibiting the individual from teaching.

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the case manager will consider how best to facilitate this and consider how the person's contact with the child or children making the allegation can best be managed.

Allegations against a teacher who is no longer teaching will be referred to the police. Historical allegations of abuse will also be referred to the police.

Confidentiality

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

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

- who needs to know and, importantly, exactly what information can be shared;
- how to manage speculation, leaks and gossip;
- what, if any, information can be reasonably given to the wider community to reduce speculation;
- how to manage press interest if, and when, it should arise.

Record keeping and references

Details of allegations that are found to have been malicious will be removed from personnel records.

For all other allegations, a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken, and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned.

Records will be retained in accordance with applicable employment, safeguarding and data protection requirements.

Cases in which an allegation was proven to be false, unsubstantiated or malicious will not be included in employer references.

A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious will also not be included in any reference.

Timescales

Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week.

If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days.

If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days.

Suspension

Suspension will not be an automatic response when an allegation is reported: all options to avoid suspension will be considered prior to taking that step.

Suspension will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal.

Based on assessment of risk, the following alternatives will be considered by the case manager before suspending a member of staff:

- redeployment within the school so that the individual does not have direct contact with the child or children concerned;
- providing an assistant to be present when the individual has contact with children;

- redeploying to alternative work in the school so the individual does not have unsupervised access to children;
- moving the child or children to classes where they will not come into contact with the member of staff, making it clear that this is not a punishment and parents have been consulted; or
- temporarily redeploying the member of staff to another role in a different location, for example to an alternative school or work for the local authority.

If immediate suspension is considered necessary, the rationale and justification for such a course of action will be agreed and recorded by both the case manager and the designated officer.

Supply staff, trainee teachers or contracted staff

We will ensure any allegations against an individual not employed by Coleridge Primary School, such as supply teachers, trainee teachers or contractors, will be dealt with properly.

We will not decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with our local authority designated officer to determine a suitable outcome.

We will discuss with the agency whether it is appropriate to suspend the supply teacher.

We will inform the agency of our process for managing allegations and invite the agency's human resource manager or equivalent to meetings as appropriate.

Where the person is a trainee teacher, the school will liaise with the relevant training provider as appropriate.

Where the person is supplied by an agency or other third party, the school will work with that organisation to ensure that safeguarding responsibilities are properly discharged.

Hiring the school site

Any allegations made against an individual or organisation using the school premises should follow safeguarding policies and procedures, including informing the LADO.

As part of our hire arrangement we seek assurances of appropriate safeguarding policies and procedures, including inspecting these where necessary.

In addition, where those hiring the school site fail to comply with our safeguarding arrangements then their contract will be terminated.

Learning lessons

At the conclusion of a case in which an allegation is substantiated, we will review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future.

Non-recent allegations

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

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

We will report any non-recent allegations made by a child to the LADO.

Low-level concerns

In line with Section Two of Part Four of *Keeping Children Safe in Education*, we recognise the importance of creating a culture of openness, trust, and transparency to encourage all staff to share low-level concerns with the right person so that they can be addressed appropriately.

The purpose of our approach to low-level concerns is to ensure that our values are constantly lived, monitored, and reinforced by staff.

Our values are outlined in more detail in our Staff Code of Conduct.

The term "low-level" concern does not mean that the concern is insignificant. It means that a staff member, supply teacher, trainee teacher, volunteer or contractor does not seem to have:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

A low-level concern covers any concern no matter how small, even if it is no more than causing a sense of unease or a "nagging doubt" – that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work;
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over-friendly with children;
- having favourites;
- taking photographs of children on a personal mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door;
- humiliating pupils.

Such behaviour can exist on a spectrum.

Our school's response to low-level concerns is an extension of our Code of Conduct. Staff are able to share their concerns confidentially in a simple and easy manner.

It is imperative that where staff do have concerns, they share them as outlined in this policy to support with building a culture of expected behaviour and promoting our school values. Low-level concerns about a member of staff, supply staff, trainee teacher, volunteer or contractor should be reported to the Headteacher or Designated Safeguarding Lead.

The Headteacher will have oversight of all recorded concerns and has ultimate decision-making power in respect of all low-level concerns.

Any concerns about the Headteacher or Designated Safeguarding Lead should be reported to the Chair of Governors.

All low-level concerns will be recorded in writing.

Each record will include details of:

- the concern;
- the context in which the concern arose;
- action taken;
- any advice received; and
- the outcome.

The name of the individual who raised the concern should be noted, but if that individual wishes to remain anonymous, that will be respected to the extent it is reasonably possible to do so.

Records will be kept confidential, held securely, and comply with data protection laws. Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or by referring to the LADO, where a pattern of behaviour moves from a low-level concern to meeting the harm threshold. We will also consider whether there are wider cultural issues existing within the school that may have enabled the behaviour to occur. If this is found to be the case, or a contributory factor, we

may review our policies and deliver extra training where we consider this will minimise the risk of such events happening again.