London Borough of Redbridge

New Rush Hall School

Child Protection and Safeguarding Policy (2026)

Last reviewed: September 2026
Next review due: September 2027

Appendices:

Types of Abuse

Safer Recruitment Policy

Allegations Against Staff (including Low-Level Concerns) Policy

Important contacts

ROLE/ORGANISATION	NAME AND CONTACT DETAILS
Headteacher	Mr Sam Walters
Designated Safeguarding Leads (DSLs)	Mr Sam Walters, Ms Emma Murphy, Ms Mabel Bibby, Ms Gail Hayes
Deputy DSLs	Mr Aris, Belenge, Ms Zoe Donnellan, Ms Michelle Hodge, Mr Paul Judge, Mr Rob Olayinka, Ms Jenny Tully
Safeguarding email address	safeguarding@nrhs.redbridge.sch.uk
SENDCo / Inclusion Manager	Ms Emma Murphy
Designated lead for Looked after and previously looked after children	Ms Gail Hayes
Safeguarding Link Governor	Ms Seema Trimby
Chair of Governors	Ms Liesbeth Rubinstein
Local Authority Designated Officer (LADO)	Website: Referral to LADO Email: lado@redbridge.gov.uk; helen.curtis@redbridge.gov.uk Tel: 020 8708 5350
MASH Duty Line	**MASH (Multi-Agency Safeguarding Hub):** Contact via completion of the online portal https://www.redbridge.gov.uk/adult-and-childrens-services/professionals-working-with-children-and-young-people/ or Call 020 8708 3885 (09:00 – 17:00 weekdays) **Emergency Duty Team (Out of Hours):** Call 020 8554 5000 for urgent help at night, on weekends, or during bank holidays.
Channel Helpline	Tel: 020 7340 7264
Redbridge Prevent programme	Website: Preventing radicalisation https://www.redbridge.gov.uk/media/nsbhxtt2/national-prevent-referral-form.pdf Email: prevent@redbridge.gov.uk
Redbridge Lead Safeguarding officer	Email: Rema.Begum@Redbridge.gov.uk Tel: 020 8708 3420

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1. Aims

At **New Rush Hall School (NRHS)** we are committed to safeguarding and promoting the welfare of every child and young person in our school community. We believe that all children have the right to grow up safe from violence, abuse, neglect, exploitation and harm, and to feel safe in their homes, school and wider community.

Our safeguarding arrangements are underpinned by the vision and values of the **Redbridge Safeguarding Children Partnership (RSCP)**. We want all children to be **happy, healthy and safe, to feel listened to, and to have the opportunity to be ambitious and achieve their full potential**. Where children or families need help and support, we will seek to ensure that this is provided at the right time, by the right person and in the right place.

Safeguarding is **everyone's responsibility**. We will create and maintain an open, positive and inclusive safeguarding culture in which the welfare, rights, wishes and experiences of children are at the heart of our practice.

To achieve this, we will:

- **Put children at the centre of safeguarding practice**, ensuring that their safety, welfare, rights and best interests are considered in all decisions that affect them.
- **Listen to children and young people**, taking their views, wishes, feelings and lived experiences seriously and providing meaningful opportunities for them to influence decisions about their lives.
- **Protect children from harm**, including abuse, neglect, violence, exploitation, crime, anti-social behaviour and other forms of harm, whether these occur within or outside the home, in school, in the community or online.
- **Promote early identification and early help**, responding to emerging concerns promptly so that children and families receive appropriate support before problems escalate.
- **Maintain an attitude of professional curiosity**, recognising that abuse and neglect may occur in any family or community and that safeguarding concerns may present in different ways. We will maintain an attitude of **"it could happen here"**.
- **Recognise and respond to vulnerability and disproportionality**, understanding that some children may face additional safeguarding risks or barriers to accessing support. We will seek to identify and address inequalities in safeguarding practice and outcomes.
- **Work in partnership with children, families and communities**, recognising the strengths, experiences and expertise they bring and actively seeking their views to inform safeguarding practice.
- **Work effectively with safeguarding partners and other agencies**, sharing information appropriately and working collaboratively to provide timely, coordinated and effective support for children and families.

- **Promote equality, dignity, respect and inclusion**, ensuring that every child is treated fairly and that safeguarding practice recognises and responds appropriately to individual circumstances, identity, culture and need.
- **Ensure that children have access to appropriate information, support and resources** so that they understand their rights, can recognise risks, know how to keep themselves safe and know where and how to seek help.
- **Provide effective safeguarding education**, including helping children to understand how to stay safe online and offline, recognise healthy and unhealthy behaviours and relationships, and develop the confidence to speak to a trusted adult.
- **Ensure that all staff, volunteers and those working with children understand their safeguarding responsibilities**, receive appropriate training and are confident to recognise, respond to, record and report concerns.
- **Promote a culture in which staff can speak out and challenge unsafe practice**, knowing that concerns about a child, an adult's behaviour or safeguarding practice will be taken seriously and acted upon appropriately.
- **Ensure robust safeguarding procedures and professional practice**, including safer recruitment, appropriate supervision and training, effective record keeping, information sharing and clear arrangements for responding to concerns and allegations involving adults who work with children.
- **Learn from experience and continuously improve**, using local and national learning, safeguarding reviews, incidents, complaints, feedback and the experiences of children and families to strengthen our practice.
- **Hold ourselves accountable to children and young people**, ensuring that decisions and actions affecting children are transparent, proportionate and focused on improving their safety, wellbeing and outcomes.

Our ultimate aim is to ensure that **every child in our school is safe, heard, valued and supported to achieve their full potential**, and that children and families receive the right help at the right time from the right people.

2. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026), and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our three local safeguarding partners (see section 3).

This policy is also based on the following legislation and statutory DfE guidance:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Children's Wellbeing and Schools Act 2026 new legislation which aims to remove barriers to opportunity in schools and improve the education system to make it safer for every child; also by strengthening regulation, improving quality of care to ensure it meets children's needs and keeping children rooted in their families and local communities where possible.
- Crime and Policing Act 2026 aims to strengthen safeguarding by giving agencies and schools greater powers and responsibilities to prevent youth crime, tackle antisocial behaviour, and protect children from exploitation and violence.
- Data Protection Act 2018, the UK GDPR and the Data (Use and Access) Act 2025 collectively known as 'data protection laws'
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- Working Together to Improve School Attendance which clarifies roles and responsibilities for schools, local authorities and parents in ensuring adequate school attendance
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race).
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation.
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage (revised for September 2026)

3. Definitions

Safeguarding and promoting the welfare of children means (KCSIE 2026):

- 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.

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

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Nudes and semi-nudes, including where generated by AI refers to the creation, sending or posting of nude or semi-nude images by young people under the age of 18.

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

The following three **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The London Borough of Redbridge
- North Central London Integrated Care Board
- The Metropolitan Police Commander for Redbridge

4. Equality statement

The Redbridge Safeguarding Children Partnership (RSCP) is committed to ensuring that all children and young people in Redbridge are safe, healthy, listened to and able to achieve their full potential. The Partnership recognises that children and families have different experiences, circumstances and needs, and that inequality, discrimination and disproportionality can affect children's safety, wellbeing and access to help and protection.

At NRHS we are committed to safeguarding every child and promoting equality, dignity, inclusion and respect. We recognise that some children may face increased risks of abuse, neglect or exploitation, or additional barriers to recognising, disclosing or accessing help.

Our approach is based on the principle that every child has the right to be safe, to be heard and to receive the right help at the right time.

We will:

- maintain an anti-discriminatory and anti-racist safeguarding culture in which racism, prejudice, discrimination and harmful stereotypes are actively challenged;
- recognise and respond to disproportionality in safeguarding, including where particular groups of children may face increased risks, barriers to support or poorer outcomes;
- ensure that children's rights, views, wishes and feelings are considered in safeguarding decisions;
- consider each child's individual circumstances, identity, culture, family and community context when assessing safeguarding needs;
- provide reasonable adjustments and additional support to ensure equitable access to safeguarding and protection;
- work in partnership with children, parents, carers, families and communities;
- ensure that safeguarding concerns relating to discrimination, racism, harassment or abuse are taken seriously, recorded and responded to appropriately;
- maintain professional curiosity and an attitude of "it could happen here", recognising that abuse, neglect and exploitation can affect any child; and
- use safeguarding learning to identify and address patterns of inequality and improve outcomes for children and young people.

Children who may require additional consideration

Some children may be more vulnerable to safeguarding concerns or face additional barriers to accessing help. This may include children who:

- have special educational needs and/or disabilities (SEND) or health conditions;
- are young carers;
- are pregnant and/or parents themselves;
- have experienced or are displaying abusive, violent or harmful behaviours, including involvement in gangs, county lines or organised crime;
- are at risk of criminal exploitation, sexual exploitation, modern slavery or trafficking;
- are showing signs of being drawn into anti-social, criminal or extremist behaviour;
- are at risk of being radicalised into terrorism or extremist activity;
- have experienced repeated suspensions, are at risk of exclusion, are on a part-time timetable or are in alternative provision;
- are missing or absent from education for prolonged periods or on repeated occasions;
- are at risk of harm where a parent or carer intends to remove them from school for elective home education;
- are looked after, previously looked after or privately fostered;
- have a parent or carer in custody or are affected by parental offending;
- are living with domestic abuse, substance misuse, adult mental health difficulties or other family circumstances that may affect their safety or wellbeing;
- are experiencing mental health difficulties;
- are misusing alcohol, drugs or other substances themselves;
- are asylum seekers or face barriers associated with their immigration circumstances;
- have English as an additional language (EAL);
- are at risk of honour-based abuse, faith-based abuse, female genital mutilation (FGM) or forced marriage; or any other form of coercion is used to cause a person to enter into a marriage.
- may experience racism, faith-targeted abuse, harassment or discrimination because of a protected characteristic, including race, ethnicity, religion or belief, perceived religion, lack of religion, sex, disability, gender reassignment or sexual orientation.

This list is not exhaustive. Safeguarding concerns may affect any child, and staff should always consider the individual circumstances, lived experience and presenting needs of each child.

Racism, Discrimination and Faith-Targeted Abuse

At NRHS we recognise that racism, discrimination and abuse targeted at a child's race, ethnicity, faith, perceived faith or lack of faith can have a significant impact on their safety, wellbeing, identity and sense of belonging.

Such behaviour may constitute a safeguarding concern in its own right and will be recognised, listened to, recorded and responded to appropriately, whether it occurs in person, online or within the wider community.

We will not minimise concerns because of a child's background, identity, disability, culture, faith, family circumstances or communication needs. We will seek to understand the child's lived experience, ensure their voice is heard and, where appropriate, work with parents, carers and safeguarding partners to provide support and protection.

Incidents of racism, discrimination and faith-targeted abuse will be appropriately recorded, monitored and reviewed to identify patterns, themes and any disproportionality. We will use this learning to strengthen our safeguarding practice, promote inclusion and improve outcomes for children and young people.

5. Roles and responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to everyone who comes into contact with children and their families has a role to play in safeguarding children and promoting their welfare. All staff, governors, trustees, volunteers, trainees, supply staff and contractors have a responsibility to provide a safe environment in which children can learn.

This policy applies to all adults working in or on behalf of the school and is consistent with the multi-agency safeguarding arrangements of the Redbridge Safeguarding Children Partnership (RSCP), led by the London Borough of Redbridge, North East London Integrated Care Board and the Metropolitan Police Service.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain and promoting an inclusive, anti-discriminatory culture in which racism, faith-targeted abuse, other forms of discrimination, sexism, misogyny, misandry, homophobia, biphobia, transphobia, sexual violence and sexual harassment are recognised, challenged and not tolerated.

This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education

5.1 All staff

All staff will:

- read and understand Part 1 of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually
- read and understand the school's safeguarding policy for the current academic year
- sign a declaration at the beginning of each academic year to say that they have reviewed the guidance and the school's safeguarding policy

- reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they will be interacting with online)
- provide a safe space for vulnerable pupils to speak out and share their concerns
- know that safeguarding incidents could happen anywhere.

All staff will be aware of and understand:

- the school systems which support safeguarding, including this child protection and safeguarding policy, the Staff Code of Conduct, the role and identity of the designated safeguarding lead (DSL), the Behaviour Policy, the Online Safety Policy and the safeguarding response to children who go missing from education
- the Community Based Early Help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- the process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- what to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- the signs of different types of abuse, neglect and exploitation (see Appendix one for details)
- recognise that racism, faith-based prejudice, and other discriminatory behaviour may have a significant impact on a child's welfare, wellbeing and sense of safety
- that racism, faith-based prejudice and other forms of discrimination can cause significant harm to a child and can adversely affect their welfare, wellbeing and sense of safety. Staff must recognise, respond to and report concerns about such harm in accordance with the school's safeguarding procedures, whether it occurs in person or online
- specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), county lines, drug taking and/or alcohol abuse, FGM, radicalisation and extremism, and the indicators that a child may be at risk of or involved in serious violence or criminal exploitation
- that these risks can occur online as well as offline, including online grooming, sexual abuse and exploitation, cyberbullying, harmful or age-inappropriate content, coercion, threats, and consensual and non-consensual making or sharing of nudes or semi-nudes
- the importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- their responsibility to be vigilant to safeguarding concerns at all times, including concerns about the conduct or behaviour of other staff, and that all concerns must be reported promptly
- the fact that children can be at risk of harm inside and outside of their home, at school and online
- the fact that children who are (or who are perceived to be) lesbian, gay or bisexual or those children who are questioning their gender can be targeted by other children
- what to look for to identify early signs of potential harm in children who need help or protection and reporting these using CPOMS so the DSL can act.
- know how to raise a concern if a child's situation does not appear to be improving following a referral.

5.2 The designated safeguarding lead (DSL) and deputy designated safeguarding lead (DDSL)

The DSL is a member of the senior leadership team. The DSL takes lead responsibility for child protection and wider safeguarding in the school, supported by one or more Deputy Designated Safeguarding Leads (DDSL). This includes the leadership of online safety, including understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

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

- provide advice and support to other staff on child welfare and child protection matters
- contribute to Community Based Early Help and social care assessments
- manage referrals of suspected abuse and neglect to social care, the Channel programme, and where a crime is committed to the Police
- take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- have a good understanding of harmful sexual behaviours and how to manage any incidents that may occur
- lead on online safety, including overseeing filtering and monitoring systems and processes in place at our school, also ensuring that regular reviews are formally recorded and reported to governors

The DSL will also:

- keep the headteacher informed of any issues
- liaise with local authority case managers and designated officers for child protection concerns as appropriate
- discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- liaise and work with the school's relevant leads for mental health, SEND, PSHE/RSE curriculum and network/technology managers (and other IT staff, e.g. AI lead, computing lead)
- promote engagement with parents/carers in safeguarding and the welfare of children
- provide strategic direction for safeguarding taking a whole school approach, including annual reviews of safeguarding and online safety to drive improvement
- raising awareness and training staff across all aspects of safeguarding
- oversee the holding and sharing of information
- be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- understanding the views of children

The DSL will always ensure their own or a DDSL's availability to discuss and deal with any safeguarding concerns. During the school day, the DSL or a DDSL will be available to staff to discuss safeguarding and child protection concerns and to provide advice and support. Where the DSL is unavailable, appropriate cover will be provided by a DDSL to ensure that safeguarding concerns can be responded to without delay.

Staff should report safeguarding concerns immediately in accordance with the school's safeguarding procedures and record concerns on CPOMS. Urgent safeguarding concerns must be brought directly to the attention of the DSL or a DDSL and staff should not rely solely upon submitting an electronic record. Parents, carers, professionals and other external agencies who wish to raise a safeguarding concern about a pupil can contact the school directly by telephone or email and ask to speak with the DSL or a member of the safeguarding team. Safeguarding concerns received through the school office will be passed to the DSL or a DDSL without delay.

Where school activities take place away from the school site, appropriate arrangements will be made to ensure that the DSL or a DDSL remains contactable. The school will also ensure appropriate safeguarding cover and contact arrangements are identified for educational visits and other activities taking place outside normal school hours.

5.3 The Governing Body

The Governing Body will:

- facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of and underpin all relevant aspects of policy and practice, and that the school promotes an inclusive, anti-discriminatory culture in which racism, faith-targeted abuse and other forms of discriminatory harm are recognised, challenged and responded to appropriately
- promote an inclusive, anti-discriminatory culture where racism, and other forms of discriminatory behaviour are recognised, challenged and addressed as part of our safeguarding responsibilities
- evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- appoint a governor to monitor the effectiveness of this policy in conjunction with the full Governing body This is always a different person from the DSL
- ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
  - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
  - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
- make sure:
  - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
  - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
    - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place in our school and that their review is formally undertaken and reported.
  - the school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors).
  - that this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
  - seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
  - make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
  - make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate.

All governors will read Keeping Children Safe in Education in its entirety and undertake safeguarding training on appointment which is updated annually.

5.4 The headteacher

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

- Ensuring that staff (including temporary staff, contractors, trainees and volunteers):
  - are informed of our systems which support safeguarding, including this policy, as part of their induction
  - are made aware of the current Safeguarding and child protection policy, and procedures, including those for online safety, and that these are implemented and followed by all staff
  - understand and follow the procedures set out in this policy, particularly those relating to the identification and referral of suspected abuse, neglect and exploitation, whether occurring online or offline
- communicating this policy to parents/carers when their child joins the school and via the school website
- ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- ensuring that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the school's whistle blowing procedures
- promoting and implementing an inclusive, anti-discriminatory safeguarding culture in which racism, faith-targeted abuse and other discriminatory harm are recognised, challenged and responded to appropriately
- acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate.
- making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- ensuring the relevant staffing ratios are met, where applicable
- making sure each child in the Early Years Foundation Stage is assigned a key person
- overseeing the safe use of technology, mobile phones, cameras, images and video and AI in the school/setting

5.5 Contracted and supply staff

Any contracted or supply staff are made aware of the school's safeguarding systems on their first arrival at school. They are expected to follow school procedures should they have a concern about a child, another member of staff or safeguarding practices at NRHS These procedures are detailed in a leaflet, on an iPad or on a screen in reception, which all contracted and supply staff are asked to read.

On first arrival supply teachers will also be given a short induction into the school's safeguarding systems by the DSL or a DDSL, so they can be vigilant of pupils throughout their time in school and are conversant with how to report any concerns they may have about a child or an adult.

6. Staff support and supervision

The DSL will make all staff aware that support and advice is available to them.

Staff should seek support from the DSL, their line manager or a senior member of staff if they feel distressed or upset following a disclosure made by a child. The DSL or a senior member can put staff in touch with outside agencies for professional support if they wish. Staff can also approach organisations such as their Union or other similar organisations directly.

Additional guidance, support, and professional supervision are available through Redbridge's Lead Safeguarding Officer, as detailed in the front of this policy, who provides safeguarding advice, consultation, and support to schools and education settings across the borough.

There is additional employee assistance and wellbeing support available to all staff through the Schools Advisory Service.

7. DSL Decision-Making

Once concerns are identified and shared with DSLs, DSLs and involved staff will decide together how best to proceed to support the child and to mitigate the risk. DSLs can consult with MASH at any point. Important contact details can be found on Page 2 of this document.

Options for action are:

Pastoral Care	Keeping Children Safe in Education acknowledges the casework that schools undertake on a pastoral level. This includes managing any support for the child internally via the school's own pastoral support processes. If pastoral staff are engaged, they must work alongside safeguarding staff, and DSLs would take the lead on decisions about progressing a case.

Community Based Early Help (MASH)	The school will work collaboratively with children, young people, parents and carers, and relevant partner agencies to identify and respond to emerging needs at the earliest opportunity. Where appropriate, and with the informed consent of the child and/or parents or carers, the school may refer a child or family for a **Family Help.** *For guidance refer to Working Together 2026 Chapter 3 section 2*

Referral to statutory services (MASH)	A referral should be made to MASH/children's social care (and if appropriate the police) immediately if the child is: • A child in need; defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled • Suffering, or likely suffering, harm. In these circumstances a Social Care Assessment will be undertaken - *For guidance refer to Working Together 2026 Chapter 3 sections 3* & 4 **Note**: Where consent is withheld, or where there are concerns that a child may be suffering, or likely to suffer, significant harm, safeguarding concerns will be referred to the appropriate children's social care service in accordance with local safeguarding procedures. **Consent will not be required where sharing information is necessary to safeguard a child**.

Allegation of harm to a child by a practitioner	If the alleged harm to a child is caused by a practitioner or a volunteer, the headteacher should be notified immediately and LADO should be consulted.

Following several cases nationally where senior leaders in schools failed to act upon concerns raised by staff, Keeping Children Safe in Education emphasises that any member of staff must contact and/or make a referral to Children's Social Care if they are concerned about a child. Contact details for Redbridge Children's services are given at the front of this policy.



Referrals to the MASH should be made immediately when there is a concern that the child is suffering significant harm or is likely to do so. It is good practice to notify MASH by phone and/or email to discuss the situation prior to sending a written referral. This will help determine the level of intervention and will also give children's social care and the police time to decide to come and see the child that same day in school, if deemed necessary.

In this school the DSL ordinarily takes responsibility for the referral process, in consultation with staff who know the child. Still, there are circumstances where another member of staff must refer without delay:

- If for some reason (e.g., during the summer break), the DSL is not available, the referral should be made without delay by any other member of school staff
- If you disagree with your DSL's decision not to refer a case to MASH, it is your responsibility to refer the case, and to respectfully inform the DSL that you are doing so.

Should another member of staff refer instead, the DSL must be consulted and updated as soon as possible.

8. Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure. The DSL or DDSL will consider the nature and circumstances of the concern and determine whether, when and how parents or carers should be informed. Where appropriate, the DSL or DDSL will contact the parent or carer as soon as reasonably practicable, explain the concern and any action the school proposes to take, and seek relevant information from them. Any discussion with parents or carers, including attempts to make contact, advice received, decisions made and the rationale for those decisions, will be recorded on CPOMS. Where there is uncertainty about whether it is appropriate to inform a parent or carer, the DSL will seek advice from children's social care and/or the police before making contact.

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

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

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

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

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

Details of conversations with parents or carers together with the rationale for any decision making in relation to informing parents and follow up actions will be formally recorded in the child's case file on CPOMS

9. Information sharing and confidentiality

Timely information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation and therefore essential to effective safeguarding. The fear of sharing information must not be allowed to prevent the promotion of the welfare of any child.

At NRHS we recognise that it is our duty to share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE 2026. The safety of the child is always paramount.

The Data Protection Act (DPA) 2018, UK GDPR and Data (Use and Access) Act 2025 (known as 'data protection laws') do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

Any concerns about sharing information must not be allowed to stand in the way of ensuring the welfare and safety of pupils. The school may legitimately share information without consent where: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; and, if to gain consent would place a child at risk.

Staff or any adult in the school should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.

The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information and will support staff who have to make decisions about sharing information.

If staff are in any doubt about sharing information, they should speak to the DSL.

10. Record-keeping

All child protection concerns and referrals are recorded and kept in a separate record for each child using the CPOMS online recording, managing and reporting system.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing, with a separate child protection record/file kept for each pupil. If you are in any doubt about whether to record something, discuss it with the DSL.

The DSL is responsible for ensuring that child protection records are kept up to date. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL (and DDSLs). Safeguarding records are shared with staff on a 'need to know' basis only.

All information should be kept confidential and stored securely.

10.1 Recording a concern

Staff must pass all safeguarding concerns on to the DSL without delay. This should include speaking to the DSL as well as making a written record on CPOMS. Records must build into a full and detailed chronology for a child and should include:

- a clear, comprehensive written account of the concern, including, where possible, the child's words
- a record made as soon as possible after the incident or event using CPOMS. If there is an immediate concern, the member of staff should consult a DSL before completing the online record, as reporting urgent concerns takes priority
- any additional evidence, such as a child's note or drawing, added to the record
- a completed body map where injuries have been observed
- any supporting evidence of communications, including discussions, emails, letters and records of phone calls.

They should ensure the records are only accessed by those who need to see them and, where the file or content within it is shared, this happens in line with the information-sharing advice set out in section 9 of this policy.

Staff should never promise a pupil that they will not pass on child protection concerns to the relevant staff and agencies. However, the child should be reassured that:

- their disclosure will be taken seriously, and it is not creating a problem
- their disclosure will only be shared with relevant staff
- staff will be sensitive to their feelings and concerns
- their wishes will be heard
- they will be kept informed of actions and support.

10.2 Managing case records

The DSL (and DDSLs) will ensure that records are kept fully up to date, with all actions, communications and relevant supporting documentation scanned and attached to the appropriate record. To ensure a comprehensive chronology of each case the DSL and DDSLs will:

- make notes of how the concern was followed up, any actions taken, decisions reached and outcomes/resolutions.
- detail a clear rationale for each decision, including instances where referrals were and were not made to another agency such as children's social care, CAMHS or the Prevent programme
- include details of responses to actions and ongoing discussions, meeting minutes and other communication
- make reference to other school records, such as first aid, medical treatment if the child is unwell, attendance and punctuality and behaviour.

Where multiple members of staff make referrals relating to a single concern about a child, the DSL (or deputies) will link the cases within CPOMS and ensure that all relevant actions and communications are recorded as a single, coherent case thread.

11. Recognising abuse and taking action

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

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

In school hours you should speak immediately to the DSL.

If it is out of school hours or in exceptional circumstances the DSL is not available in school**, make a referral to children's social care and/or the police immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

Inform the DSL as soon as possible after making the referral and ensure that a written record of the concern, referral and action taken is made on CPOMS

Key safeguarding contact details are provided on page 2 of this policy.

11.2 If a child makes a disclosure to you

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

- listen to and believe them; allow them time to talk freely and do not ask leading questions
- stay calm and do not show that you are shocked or upset
- tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- sign and date the write-up/online report using CPOMS, which will be passed on to the DSL Alternatively, if appropriate, make a referral to children's social care and/or the police directly, and tell the DSL as soon as possible that you have done so, as well as making the formal written record.

Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- not recognise their experiences as harmful
- feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

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

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

Your concern must be reported in writing using CPOMS, in accordance with school procedures, as soon as possible. You may also wish to speak in person with the DSL or DDSL as well.

The DSL or DDSL will consider the concern and decide what further action is required, including whether a referral to children's social care or another agency is appropriate.

If in exceptional circumstances the DSL or DDSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care (see page 2 for contact details). You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible and also record these in writing on CPOMS in line with school reporting procedures.

Alternatively, you can make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible and also make a written record on CPOMS

11.4 Community based Early Help assessment

Where **Family Help** or other early help support is appropriate, the DSL will coordinate the school's contribution and liaise with the relevant safeguarding partners and other agencies to ensure that the child and family receive appropriate, timely support. Parents/carers and the child themselves will be asked to contribute and give their views. School staff may also be asked to contribute to assessments, planning and reviews and, where appropriate, may act as the **lead practitioner** in accordance with local arrangements.

The DSL will keep the case under constant review. Where the situation does not seem to be improving, needs are not being met, circumstances escalate, or there is concern that the child may be suffering or likely to suffer significant harm, the school will make a referral to **local authority children's social care** in accordance with local safeguarding arrangements. The effectiveness and timescales of interventions will be monitored and reviewed, with action taken promptly where the support provided is not achieving the intended outcomes.

11.5 Referral for social care assessment

Where a concern meets the threshold for referral to local authority children's social care or the police, the DSL will make the referral promptly and ensure that all relevant information is shared in accordance with local safeguarding arrangements and information-sharing requirements.

The DSL will seek confirmation that the referral has been received and will ensure that the outcome and any agreed actions are recorded in the CPOMS case entry. Where the school does not receive an appropriate or timely response the DSL will follow the local safeguarding partnership's escalation procedures and will continue to advocate for the child until their safeguarding needs have been appropriately addressed.

In accordance with Working Together to Safeguard Children 2026, the school will contribute to any subsequent assessment, planning and intervention and will share relevant information with children's social care, the police and other agencies as appropriate. Where the child's circumstances do not improve, concerns escalate, or new information emerges, the DSL will consider whether a further referral or escalation is required. The school will continue to monitor the child's welfare and will not assume that making a referral alone has resolved the safeguarding concern. Full records of review, communications and follow up actions will be kept to form a full case chronology on CPOMS.

11.6 If you have concerns about extremism or radicalisation

If you have concerns that a child may be vulnerable to or at risk of radicalisation or extremism, you must report your concerns to the DSL or a Deputy DSL as soon as possible. The DSL will consider the nature and level of risk and agree the most appropriate course of action, which may include seeking advice or making a referral to the relevant agency or support service.

If there is an immediate risk of harm or danger, staff should take appropriate action to protect the child and contact the emergency services where necessary, informing the DSL as soon as possible

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

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

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

In an emergency, call 999 if you:

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

Staff must follow the school's safeguarding procedures for reporting and recording concerns, in addition to informing the DSL a detailed written record must be made on CPOMS by the member of staff raising the concern and by the DSL or DDSL of all communications, actions and decisions. This includes if they have made a direct referral as described above.

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

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

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

Any teacher who either:

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

must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.
Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **child under 18** must speak to the DSL and follow the local safeguarding procedures. Alternatively, a report can be made directly to the Police, in addition to alerting the DSL or DDSL, and making a written report on CPOMS.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Any member of staff who has concerns that a pupil may be at risk of FGM must report the concern to the DSL or Deputy DSL and follow the school's safeguarding and local safeguarding procedures. Staff should not examine pupils.

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures.
Teachers and any other staff discovering and reporting a concern that FGM may have been carried out must also make written record on CPOMS.

11.8 If you have a concern about mental health

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.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, follow the relevant procedure in sections 11.1 to 11.5, depending on the nature and urgency of the concern.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

12. Concerns about a staff member, supply teacher, volunteer or contractor

Any member of staff, contractor, temporary member of staff, trainee, volunteer or visitor who has a safeguarding concern or receives an allegation that a member of staff or other adult working in or on behalf of the school may have harmed a child, may pose a risk of harm to children, or may have behaved in a way that raises a safeguarding concern, must report this to the Headteacher as soon as possible. This includes concerns or allegations relating to supply teachers, agency staff, contractors, trainees, volunteers and any other individual working in or on behalf of the school.

If the concern or allegation relates to the **Headteacher**, it must be reported directly 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, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO). Contact details can be found on page 2 of this document.

If you receive an allegation relating to an incident involving an individual or organisation using the school premises to run an activity for children, the school's safeguarding policies and procedures must be followed. The Headteacher will take responsibility for managing concerns and allegations relating to staff and other adults and for making a referral to the LADO where required, in accordance with the school's procedures and relevant statutory guidance. This includes ensuring that appropriate action is taken in response to allegations and that any subsequent concerns are managed appropriately, including in relation to low-level concerns. Where the Local Authority Designated Officer (LADO) requests a management investigation or internal enquiries as part of the allegations management process, these will be undertaken promptly and completed with appropriate pace. The school recognises that management investigations should be progressed without unnecessary delay so that matters are resolved quickly for children and for those who are the subject of allegations or concerns. Wherever practicable, management investigations should be completed within 2 working weeks, whilst ensuring that enquiries remain fair, thorough and proportionate.

Where the concern or allegation relates to the Headteacher, the Chair of Governors will take responsibility for managing the concern and, where required, making the referral to the LADO.

All concerns and allegations must be handled promptly, confidentially and in accordance with the school's safeguarding procedures and statutory guidance. Staff must not investigate an allegation themselves or attempt to determine whether it is substantiated before reporting it.

Further information can be found in Appendix 3: Allegations against staff (including low-level concerns) policy.

13. Allegations of abuse made against other pupils

At NRHS we recognise that children can abuse their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child-on-child abuse. We also understand and recognise that racism, faith-targeted abuse, and other forms of discriminatory behaviour may have a significant impact on a child's welfare, wellbeing and sense of safety and should be considered within safeguarding practice where appropriate.

At NRHS all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under NRHS's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. We recognise, in line with KCSIE 2026 paragraphs 37, that child-on-child abuse is likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice-based incidents,
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

- sexual violence such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images (see definition in section 3)
- upskirting 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 (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Procedures for dealing with allegations of child-on-child abuse

If a pupil makes an allegation of abuse against another pupil:

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

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

When responding to concerns relating to child-on-child sexual violence or harassment, NRHS will follow the procedures set out in the anti-bullying policy.

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

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

To achieve this, we will:

- challenge any form of derogatory, racist, faith-targeted, discriminatory or sexualised language or inappropriate behaviour between children, including requesting or sending sexual images
- challenge and tackle any discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice-based incidents
- be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- ensure pupils are able to report abuse using our reporting systems easily and confidently
- ensure staff reassure victims that they are being taken seriously
- be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners

- support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- ensure staff are trained to understand how to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- be alert to the likelihood of the involvement of social media

Ongoing safeguarding response

The DSL will lead the safeguarding response to concerns or allegations of child-on-child abuse and ensure appropriate support is provided to all children involved. Any disciplinary action will be carried out in accordance with the school's behaviour and disciplinary procedures, including where a police or children's social care investigation is ongoing.

Any decision to proceed with disciplinary action will be considered on a case-by-case basis, taking account of the circumstances of the incident and any advice or information provided by other agencies. The school will consider:

- whether taking disciplinary action could prejudice a police investigation or subsequent prosecution, and will liaise with the police and/or local authority children's social care where appropriate;
- whether there are circumstances that would make it inappropriate or unreasonable for the school to reach its own conclusion while an external investigation is ongoing;
- the safeguarding and welfare needs of all children involved;
- any relevant vulnerabilities, additional needs or contextual factors; and
- whether any action taken could place a child at further risk of harm.

The school will ensure that safeguarding considerations remain central to any disciplinary decision and that disciplinary measures do not prevent the school from continuing to provide appropriate support and protection to children involved. This includes any decision for separation of pupils for safeguarding reasons; in such cases leaders will adhere to the school's Suspensions and exclusions policy and procedures which is in line with DfE statutory guidance paragraphs 26-34.

14. Raising concerns about safeguarding practices & whistleblowing

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding procedures and know that such concerns will be taken seriously by the senior leaders, governors and/or the LADO (see page 2 for contact details). Information on raising concerns can be found in the school's whistle blowing policy can be found within the Staff folder on OneDrive.

Where a staff member feels unable to raise an issue with the headteacher or other senior leader or governor, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- General guidance on whistleblowing can be found via: Advice on Whistleblowing
- The NSPCC whistleblowing helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call **0800 028 0285** 8am-8pm Monday to Friday and 9am-6pm Saturday to Sunday. or email: help@NSPCC.org.uk

15. Making and sharing of nudes and semi-nudes, including where generated by AI

Any staff member, adult in the school or parent/carer made aware of an incident involving the making or sharing of nudes and semi-nudes, must report this to the DSL immediately. The member of staff**, adult in the school or parent/carer** must **not**:

- view, copy, print, share, store or save the imagery, or ask a pupil to share or download it. If the imagery has already been viewed by accident, this must be reported to the DSL.
- delete the imagery or ask the pupil to delete it
- ask the pupil(s) who are involved in the incident to disclose information regarding the imagery. This is the DSL's responsibility.
- share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- say or do anything to blame or shame any young people involved

It must be explained to the pupil(s) the incident must be reported and provide reassurance that they will receive support and help from the DSL.

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded on CPOMS to form a full case chronology.

Initial review meeting

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

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

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

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

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

Informing parents/carers

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

Further review by the DSL

If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks. They will hold interviews with the pupils involved (if appropriate).

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through the Designated Ward Officer - Children and Young People (DWO-CYP) or the local neighbourhood police (101).

Curriculum coverage

Curriculum teaching in online safety is set out in sections 17.3 (online safety curriculum) and section 27 (opportunities to teach safeguarding).

16. Reporting systems for our pupils

Where there is a safeguarding concern, NRHS takes the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we:

- put systems in place for pupils to confidently report abuse.
- ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- seek and consider pupils' views on the effectiveness and accessibility of the reporting systems and responses as part of the annual safeguarding review and ongoing pupil voice activities.

17. Online safety and the use of mobile technology

17.1 Whole school approach to online safety

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

At NRHS we use a wide range of technology. This includes computers, laptops, tablets, mobile phones the internet, our learning platform, intranet, email systems, messaging systems and other digital devices. All school owned devices and systems must be used in accordance with our acceptable use policies and with the school's appropriate safety and security measures. All devices owned by staff, pupils and visitors must also be used in accordance with our acceptable use policies and the appropriate safety and security measures.

Our whole school approach to online safety is reflected in our online safety policy and other relevant school policies, and based on addressing the four categories of risk set out in KCSIE:

- **content**: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories,
- **contact**: being subjected to harmful online interaction with other users or generative AI applications that simulate this; 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**: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including those generated using AI and online bullying, and
- **commerce**: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, pupils or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/) and to the DSL.

To address this, our school:

- has robust processes in place, including filtering and monitoring systems, to ensure the online safety of pupils, staff, volunteers and governors
- protects and educates the whole school community in its safe and responsible use of technology, including mobile and smart technology, safe use of AI, online safety, cyber security and filtering and monitoring systems
- sets clear guidelines for the use of mobile phones for the whole school community
- establishes clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
- annually review our online safety strategies and systems through our Online Safety Policy and Data Protection/GDPR policies and annual audit

17.2 Filtering and monitoring

At NRHS we will aim to meet the DfE standards for filtering and monitoring in order to provide a safe learning environment for all. As part of our work to meet these standards we will:

- consider the number of and age range of our children,
- identify and assign roles and responsibilities to manage filtering and monitoring systems
- ensure the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified
- block harmful and inappropriate content without unreasonably impacting teaching and learning
- direct and supervise pupils to age-appropriate online resources and tools, according to their age, ability and those who are potentially at greater risk of harm
- be informed in part, by the risk assessment required by the Prevent Duty
- have effective monitoring strategies in place that meet their safeguarding needs and reviewed at least annually, keep a formal record of these checks and also report the findings to governors.

17.3 Online safety curriculum

At NRHS we have developed a whole school approach to online safety learning and have embedded this in our PSHE and RSHE curriculum to enable pupils of all ages to learn about and manage online risks effectively.

We will regularly provide parents and carers with information about online risks and practical guidance to help keep their children safe when using the internet and digital technologies outside school.

17.4 Online safety training for staff

NRHS will ensure that all staff receive appropriate and regular (at least annual) online safety training as part of the school's wider safeguarding training. Training will equip staff to recognise and respond to online safeguarding concerns and ensure they understand their roles and responsibilities in relation to online safety. This will include:

- the effective use of filtering and monitoring systems and the reporting of concerns.
- the safe, responsible and effective use of generative artificial intelligence (AI), including understanding potential safeguarding risks;
- awareness of the range of online risks children may experience, including those associated with gaming, social media, generative AI and excessive or inappropriate use of devices; and
- understanding how online risks can impact children's wellbeing, behaviour, relationships and safety, and how these concerns should be identified and addressed through the school's safeguarding procedures.

17.5 Artificial intelligence (AI)

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

NRHS recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse, enable misinformation, and/or expose pupils to harmful content.

To support the responsible and safe use of AI to enhance teaching, learning and operational efficiency all staff and pupils are expected to adhere to the school’s AI policy on the use of AI.

NRHS recognises that filtering and monitoring requirements apply to the use of generative AI within education. The school’s arrangements for overseeing, checking and reporting on the effectiveness of filtering and monitoring systems, including their application to generative AI tools, are referred to in section 17.2 and in our online safety policy.

Staff will be trained in the school approach to generative artificial intelligence and how to use it effectively and safely when carrying out their duties and responsibilities.

The school will treat any use of AI to access harmful content or bully pupils in line with this policy and our online safety, behaviour and child-on-child abuse policies.

17.6 Use of images, videos and CCTV

NRHS recognises the importance of safeguarding and protecting our pupils when using photographs, videos and CCTV. In accordance with data protection laws, KCSIE 2026.
To safeguard our pupils, we will:

- ensure all images and recordings are stored securely and accessed only by authorised staff and retained for no longer than necessary.

- obtain parental consent for the use of photographs and videos of pupils and ensure they are used only for legitimate school purposes and in accordance with the permissions given.
- ensure that staff do not take, store or share photographs or videos of pupils using personal devices or unless authorised to do so.
- ensure that all photographs or videos of pupils are managed in accordance with our safeguarding and data protection procedures, that any concerns of inappropriate use, sharing or storage of images or videos is reported to the DSL and/or data protection officer
  use CCTV appropriately to support the safety and security of pupils, staff and visitors and to help prevent and investigate incidents. CCTV will be operated in accordance with the school's CCTV and data protection procedures, with appropriate signage and controls in place.

17.7 Mobile phones

At NRHS mobile phones are not permitted to be used by pupils during the school day, in accordance with the Department for Education's guidance on mobile phones in schools.

17.8 Information security and cyber security

NRHS takes full responsibility to safeguard the school's systems, and the information held on staff and pupils. Cyber security arrangements are in place to ensure all information is held securely and in line with data protection laws. Our procedures are periodically reviewed for their effectiveness to keep up with evolving cyber-crime technologies and ensure the security and integrity of school systems. We are working to meet the DfE cyber security standards for schools to help improve our resilience against cyber-attacks.

Should a data breach or cyber incident occur, we will follow NRHS' Cyber Incident Response Plan.

Our Governing body will make use of guidance and resources from the National Cyber Security Centre – NCSC, to support the school in maintaining and strengthening its cyber security arrangements.

18. Vulnerable Pupil Groups (children potentially at greater risk of harm)

Whilst all children should be protected, we, at NRHS recognise that some groups of children are potentially at greater risk of harm than others (both online and offline). The list below is not exhaustive but highlights some of those groups.

We offer additional pastoral support for all our more vulnerable pupils.

18.1 Children with SEND

We recognise that pupils with SEND can face additional safeguarding challenges and are more vulnerable to abuse than their peers. Additional barriers can exist when recognising abuse and neglect in this group, include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's needs and/or disability without further exploration
- pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- the potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs

- communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse
- the need for intimate care or that these children are isolated from others
- that these children are more likely to be dependent on adults for care, and
- these children may have issues over cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

Any reports of abuse involving children with SEND will therefore require close liaison between the DSL (or DDSL) and our SENCo, along with any additional pastoral support and care they may need.

18.2 Children with medical conditions

An incident relating to the management of a pupil's medical condition, including allergies, will not in itself constitute a safeguarding concern or require a referral to local safeguarding partners. However, a safeguarding referral will be considered where there are concerns that a child or young person's medical condition may increase their vulnerability to neglect, abuse or exploitation, or where their medical needs are not being appropriately met. This may include situations where essential information about a child's medical condition has not been shared with the school, or where a child is repeatedly sent to school without essential medication or support, placing them at risk of harm.

We will take further advice from the DfE statutory guidance on Supporting pupils at school with medical conditions and Allergy safety in schools. Please also refer to our school supporting pupils with medical conditions, allergy and first aid policies.

18.3 Pupils requiring mental health support

The school recognises the importance of supporting children and young people's mental health and emotional wellbeing. 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 suicide. Staff should also be alert to changes in behaviour, presentation, attendance or emotional wellbeing. Any of these could be an indication that a child has suffered or is at risk of suffering abuse, neglect or exploitation and therefore may require. appropriate early help, pastoral and specialist mental health support

If a member of staff has any concerns about a child's mental health or safety, they should follow the school's safeguarding procedures, reporting this on CPOMS and speaking to the DSL or DDSL In line with KCSIE 2026, we will work with pupils, parents/carers and relevant professionals to ensure that timely and appropriate support is provided.

Staff should be mindful that only an appropriately trained professional should attempt to make a diagnosis of a mental health problem. However, staff still have an important role to play in promoting good mental wellbeing and preventing the onset of mental illness.

18.4 Pupils with a social worker

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

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

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

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

18.5 Looked-after and previously looked-after children

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

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

We have appointed a designated teacher who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

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

As part of their role, the designated teacher will:

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

18.6 Care leavers

NRHS recognises that care leavers may require ongoing support. The DSL and/or Designated Lead for looked after children will maintain relevant contact details and work with the young person's Personal Advisor as necessary to address any safeguarding or welfare concerns affecting the care leaver.

18.7 Young carers

A young carer is a person under 18 who provides, or intends to provide, care for another person, other than where the care is provided under a contract, as voluntary work or otherwise for payment. Being a young carer does not constitute a safeguarding concern. However, caring responsibilities may contribute to or indicate additional vulnerability.

NRHS recognises that children and young people who provide, or intend to provide, care for a family member may be particularly vulnerable to a range of safeguarding and wellbeing concerns.

We will seek to identify young carers at the earliest opportunity and ensure that their caring responsibilities are considered as part of its safeguarding, pastoral, attendance, inclusion and early-help arrangements. Staff should be alert to the possibility that a child may be a young carer even where this has not been formally identified, and information passed to the DSL.

18.8 Homelessness

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

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

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

18.9 Gay, Lesbian and bisexual children

NRHS recognises that being lesbian, gay or bisexual is not in itself an inherent risk factor for harm; however, children who are, or are perceived to be, lesbian, gay or bisexual may be targeted by other children and may therefore be vulnerable to safeguarding concerns. We will:

- ensure all pupils are treated with dignity and respect;
- take action to prevent and respond to discriminatory bullying, harassment and abuse, including that related to sexual orientation; and
- provide a safe and supportive environment where children can speak to trusted adults and raise any concerns.

If a member of staff has any concerns that a pupil, who is, or is perceived to be, lesbian, gay or bisexual is at risk of or subject to discriminatory bullying, harassment and abuse, they should follow the school's safeguarding procedures, reporting this on CPOMS and speaking to the DSL or DDSL.

18.10 Children who are gender questioning

At NRHS we will ensure that the safeguarding and wellbeing of children who are questioning their gender are considered sensitively, respectfully and on a case-by-case basis, in accordance with this Child Protection and Safeguarding Policy and the current statutory guidance set out in Keeping Children Safe in Education.

If a child or parent/carer raises this issue, we will:

- listen to the child's views and take account of their wishes and feelings, while ensuring that safeguarding remains our primary consideration;
- consider any specific vulnerabilities or risks, including bullying, harassment, discrimination, isolation or mental health concerns, and take appropriate action where required;
- work with parents/carers and relevant professionals where appropriate and in accordance with the child's individual circumstances, safeguarding duties and relevant statutory guidance; and
- record relevant concerns, discussions, decisions and actions appropriately on CPOMS.

19. Child leaving or joining the school

19.1 Child leaving the school

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within **5 days** for an in-year transfer, or within **the first 5 days** of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL should consider sharing information in advance of the child leaving, where this would enable the receiving school to make any necessary preparations to ensure the safety of the child on arrival at the new school.

If the next school is not known, the school procedures for children missing from education (CME) must be followed and in the case of a child of any concern, children's services alerted. Once the child is removed from roll and their file transferred, their safeguarding file is archived.

Where a pupil is home-educated or leaves the country, their safeguarding file will be securely retained and archived in accordance with the school's records retention policy.

19.2 Child joining the school

When a child joins NRHS we will ensure that all relevant safeguarding and child protection information is obtained promptly from the child's previous school or setting. This information will be transferred securely, stored in accordance with our record-keeping procedures, and shared with appropriate staff on a need-to-know basis to ensure that the child's safety and welfare are effectively supported from the point of admission.

20. Remote education

The school's policy on remote education includes the arrangements for the safeguarding of pupils while they are learning from home. The school will maintain regular contact with their parents/carers. As part of our regular communications with parents/carers we will reinforce the importance of pupils being safe online. This includes:

- providing information to parents and carers to help them understand what systems the school has in place to filter and monitor online use
- informing parents and carers of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school (if anyone) their child is going to be interacting with online.

If a pupil fails to log on when expected to, the DSL or other member of staff will make contact with parents/carers to check on the safety and wellbeing of the pupil and may make a home visit.

21. Use of alternative provision

From time-to-time we place a pupil with an alternative provision provider. We have a policy and clear protocols for the use of alternative provision. The school retains responsibility for the safeguarding of pupils placed in alternative provision and will undertake appropriate due diligence before any placement is made. This will include a visit to the provision by a member of school staff to ensure that it is suitable for the pupil's individual needs and has robust safeguarding arrangements in place that meet the requirements of KCSIE.

We will obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, in line with the checks the school would undertake for its own staff. The provider must also inform the school of any staffing changes or other arrangements that may put the child at risk, so that appropriate safeguarding checks can be assured. In addition, we will obtain written assurance that the provider knows where the pupil is based during school hours and will notify us immediately if a child is not attending, goes missing or a safeguarding concern is identified. We will review placements at least half-termly.

22. Elective Home Education

From September 2016 the Education (Pupil Registration) (England) Regulations 2006 were amended so that schools must inform their LA of all deletions from their admission register when a child is taken off roll.

Where a parent/carer expresses an intention to remove a child from school to educate them at home, NRHS will work with Redbridge local authority and other relevant professionals to coordinate a meeting with the parent/carer, where possible, before a final decision is made. This is particularly important where a child has special educational needs or a disability, has a social worker, or is otherwise vulnerable.

NRHS recognises that some children educated at home may not receive a suitable education and may be less visible to services responsible for their safety and wellbeing. We will discuss these considerations with parents expressing an intention to remove their child from the school to support an informed decision that is in the child's best interests.

23. Private Fostering

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. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. If such arrangements come to the attention of school staff through the normal course of their interaction with children, we will notify the appropriate Redbridge Local Authority to allow officers to check the arrangement is suitable and safe for the child.

We will follow the guidance set out in Championing kinship care: national kinship care strategy working with the Redbridge Virtual School head to support any children in kinship care arrangements and to promote their achievement. Staff can email virtualschool@redbridge.gov.uk.

24. Children staying with host families

NRHS may make arrangements for pupils to be provided with care and accommodation by a host family to whom they are not related, for example as part of a foreign exchange visit or sports tour. In such circumstances, we will consider the suitability of the adults in the respective families who will be responsible for the visiting child during the stay in line with guidance on host families in KCSIE 2026.

25. Preventing radicalisation

Children can be vulnerable to extremist ideology and radicalisation. NRHS recognises its responsibility to protect pupils from the risk of being drawn into terrorism or extremist activity and to fulfil its duties under the Prevent duty.

The DSL will ensure that a Prevent risk assessment is completed and reviewed at least annually, and when circumstances change. The assessment will consider risks within the school and the wider context, including online risks, and identify appropriate measures to reduce those risks.

All staff will receive appropriate training to recognise indicators that a pupil may be at risk of radicalisation or being drawn into extremist activity and know how to report concerns. Prevent awareness will be reinforced through safeguarding updates and briefings.

Through the curriculum, PSHE, online safety education and the school's ethos and values, pupils will be supported to develop critical thinking, understand risks associated with extremism and radicalisation, and know how to seek help and support. The school promotes an inclusive environment and fundamental British values.

As set out in section 11.6, staff must report concerns about radicalisation or extremism in accordance with the school's safeguarding procedures, alerting the DSL or DDSL and also making a written report of the concern on CPOMS.

26. Restrictive interventions, including the use of reasonable force

At NRHS, we recognise that all behaviour is a form of communication and that the use of restrictive interventions, including reasonable force, should be avoided wherever possible. Staff will seek to prevent situations from escalating through positive relationships, appropriate planning, early intervention, de-escalation and strategies which take account of pupils' individual needs.

NRHS follows the Department for Education guidance *Restrictive interventions, including the use of reasonable force, in schools*. Any use of reasonable force will be lawful, necessary, reasonable and proportionate to the circumstances. Staff will use the minimum degree of force necessary for the shortest possible period of time and will consider the risks associated with both intervening and not intervening.

Reasonable force may be used where permitted by law, including to prevent a pupil from committing an offence, injuring themselves or others, damaging property, or prejudicing the maintenance of good order and discipline. The decision to use force will always depend upon the individual circumstances and the professional judgement of the staff involved.

Particular consideration will be given to pupils with SEND, communication needs, medical conditions, trauma or other vulnerabilities. Where it is known that a pupil may be at increased risk of requiring restrictive intervention, appropriate individual planning and risk assessment will be undertaken, involving the pupil, parents or carers and relevant professionals where appropriate. Staff should consider known triggers, communication needs and effective preventative and de-escalation strategies.

Restrictive intervention will never be used as a punishment or to cause pain, suffering, humiliation or distress. Seclusion will only be used in accordance with the law and current statutory guidance and must never be used as a disciplinary sanction.
Following any significant incident involving the use of force, the school will ensure that the pupil's immediate physical and emotional wellbeing is considered and that appropriate support, medical attention and opportunities for reflection or debrief are provided. Staff involved will also be offered appropriate support and debriefing.

In accordance with the statutory requirements in force from 1 April 2026, NRHS will ensure that each significant incident involving the use of force is recorded in writing as soon as practicable. Significant incidents of seclusion will also be recorded in accordance with the relevant statutory requirements. Records will include sufficient information to understand the circumstances leading to the intervention, preventative and de-escalation strategies used where applicable, the nature and duration of the intervention, any injuries or medical attention required, and the action taken following the incident.

Parents or carers will be informed of significant incidents involving the use of force or seclusion as soon as practicable, subject to the statutory exceptions where sharing this information with a parent may place the pupil at risk of significant harm. Where appropriate, the DSL will be consulted regarding any safeguarding implications arising from an incident.

Incidents involving restrictive intervention will be reviewed by appropriate senior leaders to consider whether the intervention was necessary and proportionate, whether preventative or de-escalation strategies were effective, whether any changes are required to the pupil's individual support or risk-management arrangements, and whether there are patterns or wider safeguarding concerns requiring further action.

Staff who may be required to use restrictive interventions will receive appropriate information, guidance and training. NRHS will ensure that its approach to restrictive intervention is consistent with safeguarding, behaviour and SEND practice and with current Department for Education guidance.

27. Opportunities to teach safeguarding

At NRHS, we recognise our essential role in helping pupils understand healthy and appropriate behaviour, recognise when they or others may be unsafe, and know how and where to seek help and support. Preventative education is a fundamental part of our safeguarding approach and is adapted to reflect the needs, experiences and vulnerabilities of the pupils who attend our provision.

Safeguarding is embedded throughout the curriculum and wider provision, including through RSHE/PSHE, online safety education, tutor and mentoring work, assemblies, targeted interventions and other age and developmentally appropriate activities. Opportunities to teach safeguarding are not limited to planned curriculum lessons; staff use their knowledge of individual pupils, emerging safeguarding concerns and local and contextual safeguarding information to provide timely education, discussion and intervention where appropriate.

We recognise that pupils attending Alternative Provision may have complex needs and may be particularly vulnerable to harm within and beyond the home and school environment. Our preventative curriculum therefore includes age and needs-appropriate teaching about child criminal exploitation (CCE), child sexual exploitation (CSE), county lines, gangs and group-based offending, serious youth violence, knife crime and weapons, coercion and manipulation, harmful peer relationships, substance misuse, missing episodes, unsafe adults and peer groups, and the risks associated with money, gifts, debt and perceived status. Pupils are supported to recognise that exploitation may initially appear to offer friendship, protection, belonging, money or other rewards and to understand how these relationships can develop into coercion, control and abuse.

Our approach reflects the importance of contextual safeguarding. Staff recognise that harm can occur within a pupil's wider social environment, including within peer groups, neighbourhoods, parks and public spaces, transport networks and online. Teaching and targeted work are therefore informed, where appropriate, by emerging patterns identified through safeguarding records, pupil voice, attendance and behaviour information, local intelligence and information shared by safeguarding partners and other agencies.

Online safety is addressed as an integral part of safeguarding education rather than as a separate issue. Pupils are supported to understand risks associated with social media, messaging and gaming platforms, online relationships, grooming and exploitation, sharing sexual imagery, AI-generated and manipulated sexual content, harmful or misogynistic online material, cyberbullying, scams and other forms of online coercion or abuse.

We recognise that pupils with SEND and additional communication, learning, social or emotional needs may experience additional barriers to recognising, understanding or reporting abuse and exploitation. Safeguarding education will therefore be differentiated according to pupils' individual needs and levels of understanding. Staff will consider how communication needs, social understanding, trauma, previous experiences, developmental level and other vulnerabilities may affect a pupil's ability to identify risk, understand healthy relationships and seek help.

We promote an inclusive and anti-discriminatory culture of respect in which racism, faith-targeted abuse and other forms of discrimination, sexism, misogyny, misandry, homophobia, biphobia, sexual violence, sexual harassment, harmful sexual behaviour, derogatory behaviour and other forms of violence or abuse are recognised, challenged and not tolerated.

Pupils are taught about consent, boundaries, respectful relationships and how to recognise controlling, coercive, abusive or exploitative behaviour. They are encouraged to speak openly about worries and concerns and are regularly reminded of the trusted adults and other sources of support available to them. We seek to create an environment in which pupils are confident that concerns will be listened to, taken seriously and responded to appropriately.

Where individual pupils or groups are identified as being at increased risk, the universal safeguarding curriculum will be supplemented by targeted work and individual intervention. Where appropriate, this will be planned alongside parents or carers and relevant professionals, including children's social care, police, health services and other agencies, while ensuring that information sharing remains appropriate and proportionate.

The provision will regularly review its safeguarding curriculum in light of emerging safeguarding themes, local and national risks, pupil needs and learning from safeguarding incidents. This ensures that preventative education remains relevant to the actual experiences and risks faced by pupils rather than being limited to a fixed programme of lessons.

Any external organisations, resources or speakers used to support safeguarding education will be assessed in advance. This will include consideration of educational value, age and developmental appropriateness, suitability for the needs and vulnerabilities of the pupils, safeguarding arrangements and any appropriate checks required.

28. Staff Training

28.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand NRHS' safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This includes contractors, trainees and volunteers.

This training will be regularly updated and will:

- be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- be in line with advice from the 3 safeguarding partners
- include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- include how to recognise and respond to child-on-child abuse that is prejudice-based or discriminatory, including racism and faith-targeted abuse
- have regard to the Teachers' Standards to support the expectation that all teachers will have a clear understanding of the needs of all pupils and will manage behaviour effectively to ensure a good and safe environment

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

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

28.2 The DSL and Deputy DSLs

The DSL and Deputy DSLs will undertake child protection and safeguarding training at least every 2 years. They will also undertake any additional training in specific safeguarding aspects to better support their roles, for example in domestic abuse, knife crime or child-on-child abuse.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

28.3 Governors

All governors will receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

As the Chair of Governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

29. Recruitment

At NRHS we follow Safer Recruitment requirements in line with the guidelines set out in KCSIE Part 3 as documented in our Safer Recruitment Policy.

At least one person conducting any interview for any post at the school will have undertaken Safer Recruitment training. This will cover, as a minimum, in line with the expectations given in KCSIE and in line with local safeguarding procedures. This training will be renewed at least every two years.

30. Volunteers

NRHS will carry out appropriate safeguarding and safer-recruitment checks on all volunteers and will complete a written risk assessment when deciding whether a Disclosure and Barring Service (DBS) check is required and, where eligible, the level of check to obtain. The assessment will take account of the nature and frequency of the role, the ages of the children, the degree of contact with children, whether the volunteer will work alone or be supervised, and any other relevant safeguarding risks.

From 1 September 2026, supervision does not prevent a volunteer's work from being regulated activity. A volunteer who teaches, trains, instructs, cares for or supervises children on more than three days in any 30-day period, or overnight, will be engaging in regulated activity even if supervised. The school will obtain an enhanced DBS check with children's barred-list information for any volunteer engaging in regulated activity and will ensure that a barred person is not permitted to undertake that activity.

Where a volunteer is not engaging in regulated activity, the school will determine whether an enhanced DBS check without barred-list information is appropriate and legally available, based on the role and its associated risks. The school will not request barred-list information unless the role is eligible for it.

All volunteers will receive appropriate safeguarding induction, understand the school's safeguarding procedures and staff code of conduct, know how to report concerns, and be appropriately supervised. Volunteer checks, risk assessments, decisions and supervision arrangements will be recorded and reviewed if the role or circumstances change.

31. Attendance and Punctuality

31.1 School attendance and punctuality policy

NRHS has in place an attendance policy which can be found with the staff folder on OneDrive, based on the DfE guidance Working together to improve school attendance.

We aim to ensure that all children attend school regularly and punctually, so that they can access their education, achieve their potential and remain safe. We monitor attendance closely and take appropriate action where attendance causes concern, working with children, parents/carers and relevant agencies to identify and address barriers to regular attendance.

In line with the recommendation in KCSIE 2026, where reasonably possible, we will hold more than one emergency contact number for each pupil.

31.2 Children Missing in Education

If a child on roll at NRHS does not attend because of a move of home or school, because the parent has decided to home educate, or for a reason unknown to the school, the following steps will be taken:

- the child will remain on roll at NRHS until removal from the roll is authorised by the Redbridge attendance team and the Headteacher
- the new school will be contacted and confirmation of the child's registration received in writing
- the school will inform Redbridge local authority if enrolment at another school cannot be confirmed.

31.3 Children Absent in Education

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

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

- are at risk of harm or neglect
- are at risk of forced marriage or FGM
- come from gypsy, Roma, or traveller families
- come from the families of service personnel
- go missing or run away from home or care
- are supervised by the youth justice system
- cease to attend a school
- come from new migrant families.

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual

exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

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

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

31.4 Missing pupils

Where a pupil is discovered to be missing from a lesson, activity or the school site, staff will immediately inform a member of the senior leadership team and/or DSL/DDSL. Appropriate checks will be made of the school site and the pupil's last known whereabouts will be established, including speaking with relevant staff and pupils and reviewing available information where appropriate.

The response will be informed by an immediate assessment of risk, taking account of the pupil's age, SEND and communication needs, known vulnerabilities, emotional presentation, previous missing episodes, safeguarding history and any known risks relating to exploitation, self-harm, substance misuse, serious violence or unsafe adults, peers or locations.

Where it is established or reasonably believed that a pupil has left the school site without permission, parents or carers will be contacted as soon as practicable and informed of the circumstances. Staff will make reasonable attempts to contact the pupil directly where appropriate and will consider known locations to which the pupil may have gone. Staff will not place themselves, the pupil or others at additional risk by pursuing a pupil.

Where there are immediate safeguarding concerns, the pupil cannot be located, or the circumstances indicate that the pupil may be at significant risk of harm, the police and/or children's social care will be contacted without delay. Decisions about escalation will be based on the individual circumstances and level of risk and will not rely solely upon a predetermined period of time having elapsed.

Where a pupil is located or returns to the provision, their immediate welfare and safety will be established. An appropriate member of staff will speak with the pupil to understand what happened, where they have been and whether they experienced or were exposed to any harm while missing. Any further safeguarding action, including referrals to other agencies, will be taken where necessary.

The incident, actions taken, contacts with parents/carers and other agencies, the pupil's account and any subsequent safeguarding action will be recorded on CPOMS. Repeated missing or unauthorised absence episodes will be reviewed by the DSL to identify patterns, locations, peer associations or other indicators of contextual safeguarding, criminal or sexual exploitation or other emerging risks.

31.5 Non-collection of children

Where a pupil is expected to be collected from the provision or transported home and the agreed parent/carer or transport arrangement does not arrive, the pupil will remain under the supervision of an appropriate member of staff in a safe place while attempts are made to resolve the situation.

Staff will check the agreed collection or transport arrangements and make reasonable attempts to contact the pupil's parents/carers and other authorised emergency contacts. Where commissioned school or local authority transport is involved, the relevant transport provider and/or local authority team will also be contacted as appropriate.

A pupil who is expected to be collected will not be permitted to leave independently unless this has been agreed with the parent/carer and it is considered safe and appropriate to do so, having regard to the pupil's age, needs, vulnerability and any relevant safeguarding information.

If contact cannot be established and the pupil remains uncollected, the DSL/DDSL or senior leader will assess the circumstances and determine the appropriate next steps. Where there are concerns about the pupil's welfare, the safety of returning home, or the circumstances surrounding the failure to collect, advice will be sought from children's social care and/or the police as appropriate. A member of staff will remain with the pupil until a safe arrangement has been established.

The circumstances, attempts to contact parents/carers, decisions made and eventual collection or travel arrangements will be recorded appropriately. Repeated incidents of non-collection will be considered by the DSL to determine whether they indicate a wider safeguarding, neglect, family support or transport concern and whether further action or referral is required.

32. Regulations and safeguarding requirements relating to school premises

32.1 Toilets

At NRHS we provide separate toilets for boys and girls aged 8 and over (apart from where individual toilets are in a room intended for use by one pupil at a time). This is required by the School Premises (England) Regulations 2012 and Education (Independent School Standards) Regulations 2014.

At NRHS we do not allow children into toilets designated of the opposite biological sex. This includes when we are responding to a request to support any degree of social transition for children questioning their gender. If a child questioning their gender does not want to use the toilet designated for their biological sex, we will consider if we can provide an alternate toilet facility which will not compromise the safety, comfort, privacy or dignity of the child or any other children.

32.2 Changing rooms and showers

At NRHS we provide changing and shower facilities appropriate to the pupils they are provided for, taking account of their age, number, sex and any special requirements.

At NRHS we do not allow a child, aged 11 years or older at the start of the school year, to undress in front of a child of the opposite biological sex. This is mandated by the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014, which require maintained schools, academies and independent schools to provide suitable changing accommodation and showers for pupils who are aged 11 years or over at the start of the school year.
When responding to a request to support any degree of social transition, a school must not allow a child access to changing rooms designated for the opposite sex.

33. Checking the identity and suitability of visitors

All visitors must report to the reception on arrival.

All visitors, including volunteers, supply staff and contractors, will be required to verify their identity to the satisfaction of staff and state the purpose of their visit to the school. They will also be asked to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors, including volunteers, supply staff and contractors, should be ready to produce photographic identification (such as a driver's licence) on first arrival.

Visitors, including volunteers, supply staff and contractors, are expected to wear a visitor's badge at all times.

On arrival all visitors, including volunteers, supply staff and contractors, are provided with information detailing the school's safeguarding procedures via a leaflet. All visitors and volunteers, supply staff and contractors, are expected to follow our school safeguarding practices and procedures should they have a concern about a child, a member of staff or any another adult.

Visitors, including contractors, to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- the organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times.

We will not invite into the school any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

34. Site security

At NRHS we maintain appropriate controls over access and visitors, secure entrances and exits, effective supervision of pupils, and procedures for responding to unidentified or unauthorised individuals on the premises.

All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light. This includes following school procedures for challenging any individual who is not known or identifiable.

In the event of a serious incident, NRHS has emergency procedures in place to support the safety and welfare of pupils, staff and visitors. Staff and pupils will be made aware of the relevant procedures and the actions they should take in the event of an emergency.

Leaders will regularly review site security arrangements and address identified risks through appropriate risk assessments and control measures. This includes consideration of safeguarding during pupil arrival and collection times, school events, contractors working on site and any special circumstances where normal site security arrangements are altered.

35. Use of school premises by outside organisations

Our facilities/premises are hired or rented out to organisations or individuals on both a regular and occasional basis. At NRHS we will seek assurance and verification that the organisations or individuals concerned have appropriate safeguarding and child protection policies and procedures in place in line with DfE guidance Keeping children safe during community activities, after school clubs and tuition.

We will also put in place arrangements for a representative of the organisation or individual hiring our facilities to liaise with the school on any safeguarding concerns. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll. As part of the terms of hire agreement between the school and organisation, we will seek written assurance that each hirer has appropriate arrangements in place to keep children safe in line with KCSIE 2026.

If a concern is raised about an adult working for any of the organisations or an individual using the school's premises, the school will follow its procedures for dealing with allegations against staff, this includes informing the LADO.

Any services or activities provided by the Governing body and under the direct supervision or management of their school, the school arrangements for child protection will apply.

36. Transport and off-site activities

Children must be kept safe while on outings. NRHS will assess the risks or hazards which may arise for children and identify the steps to be taken to remove, minimise and manage those risks and hazards. Risk assessments will take account of the age, needs and individual circumstances of the children attending and must include consideration of appropriate adult-to-child ratios.

Where pupils are transported in vehicles, the vehicles and drivers will be appropriately insured and suitable for transporting children. Pupils will use appropriate restraints, including seat belts and child seats where required. Pupils will be appropriately supervised at all times.

Staff will be aware of the school's safeguarding procedures and know what to do if a child becomes separated from the group, goes missing, is injured, or a safeguarding concern arises while on an outing. Appropriate procedures will be in place for responding to emergencies and highlighted through the risk assessment.

Where staff use their own vehicles to transport pupils, this must be authorised by NRHS' senior leadership team. Staff must hold a valid driving license and ensure that their vehicle is roadworthy, appropriately insured for transporting pupils and fitted with suitable seat belts/restraints. Occasional Business Use insurance is procured by the school. Appropriate safeguarding and supervision arrangements must be in place, and any incidents or concerns must be reported to the DSL.

For further details staff should refer to our Educational Visits and School Trips Policy.

37. Links with other policies

This policy links to the following school policies and procedures:

- Anti-bullying Policy
- Attendance policy
- Behaviour policy
- Complaints policy
- Equality Information and Objectives Statement
- First aid policy
- Health and safety policy
- Online safety policy
- Relationships and sex education policy
- Safer recruitment policy
- Special education needs & disability policy
- Staff code of conduct
- Supporting pupils with medical conditions policy
- Exclusions policy
- Whistleblowing policy

38. Monitoring and review arrangements

At NRHS we take a proactive approach to monitoring safeguarding arrangements in place to ensure they are effective. The DSL and Headteacher will provide regular reporting on child protection and safeguarding to the Governing body. These reports will not include details of individual children's situations or identifying features of families as part of their oversight responsibility.

The Governing body has adopted varied approaches to the monitoring of the school's safeguarding arrangements, these include:

- regular meetings with the DSL and other key staff
- visits to school
- ascertaining the views of staff, pupils and parents through formal and informal discussions and/or surveys
- asking all governors to ask a safeguarding question during meetings with leaders/staff on other aspects of school life,
- checking the Single Central Register 3 times per year
- reviewing school data
- use of external consultants.

The DSL will undertake an annual audit of safeguarding using the Redbridge safeguarding audit tool. This will be submitted to the Redbridge safeguarding team and reviewed. Information from the audit will be used to improve our child protection and safeguarding arrangements**.**

This policy will be reviewed annually and then ratified by the full Governing body.

Appendices

Appendix 1: Types of abuse, neglect and exploitation

All staff should be aware that abuse, neglect, exploitation 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.

Abuse: 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 institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse. *(KCSIE 2026)*

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
Emotional abuse may involve:

- conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person as well as other verbal abuse, such as persistent criticism or name-calling
- not giving the child opportunities to express their views, deliberately silencing them or belittling by 'making fun' of what they say or how they communicate
- age or developmentally inappropriate expectations being imposed on children. these may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- seeing or hearing the ill-treatment of another
- serious bullying (including cyber-bullying), 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.

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

- Physical contact, including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)
- 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 can take place online as well as offline, and technology can be used to facilitate offline abuse
- 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.
- Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Children are more likely to know the person who abuses them than not. A child under the age of 13 can never legally consent to sexual activity.

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

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate caregivers)
- Ensure access to appropriate medical care or treatment
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 2: Safer recruitment policy

Recruitment and selection process

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- our school's commitment to safeguarding and promoting the welfare of children
- that safeguarding checks will be undertaken
- the safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

- include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- consider any inconsistencies and look for gaps in employment and reasons given for them
- explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
  - if they have a criminal history
  - whether they are included on the barred list
  - whether they are prohibited from teaching
  - information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  - any relevant overseas information
- sign a declaration confirming the information they have provided is true.

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references, we will:

- not accept open references
- liaise directly with referees and verify any information contained within references with the referees
- ensure any references are from the candidate's current employer and completed by a senior person. where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- resolve any concerns before any appointment is confirmed.

Interview and selection

When interviewing candidates, we will:

- probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- explore any potential areas of concern to determine the candidate's suitability to work with children
- record all information considered and decisions made

Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- verify their identity
- obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- verify their mental and physical fitness to carry out their work responsibilities
- verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- verify their professional qualifications, as appropriate
- ensure they are not subject to a prohibition order if they are employed to be a teacher
- carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:

  - for all staff, including teaching positions: criminal records checks for overseas applicants
  - for teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- in academies, free schools and independent schools, carry out a check if the candidate is the subject of a section 126 direction that prohibits them from taking up a management position as an employee.

Regulated activity means a person who will be:

- responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- there are concerns about an existing member of staff's suitability to work with children; or
- an individual moves from a post that is not regulated activity to one that is; or
- there has been a break in service of 12 weeks or more

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

- we believe the individual has engaged in relevant conduct; or
- we believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- we believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

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

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

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

Trainee/pupil teachers

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

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

Volunteers

All volunteers will be subject to appropriate safeguarding and safer recruitment checks before starting their role**.**

Volunteers who teach, train, instruct, care for or supervise children on more than 3 days in any 30-day period, or overnight between 2am and 6am, will be considered to be engaging in regulated activity and will require an Enhanced DBS check with Children's Barred List information, regardless of supervision.

Volunteers who do not meet these regulated activity criteria will be subject to appropriate checks and risk assessment based on their role and level of contact with pupils.

Governors

All governors will have an enhanced DBS check without barred list information.
They will have an enhanced DBS check with barred list information if working in regulated activity.
All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).
All proprietors, trustees, local governors and members will also have the following checks:

- a section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008).
- identity
- right to work in the UK
- other checks deemed necessary if they have lived or worked outside the UK

Adults who supervise pupils on work experience

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

Appendix 3: Allegations against staff (including low-level concerns) policy

Section 1: Allegations that may meet the harm threshold

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

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

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

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

An Investigating Officer will lead any investigation. This will be the headteacher, or the chair of governors where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.
If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

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

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

- redeployment within the school so that the individual does not have direct contact with the child or children concerned
- providing an assistant to be present when the individual has contact with children
- redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- temporarily redeploying an employee or changing the duties of a volunteer or other individual to reduce or remove contact with children whilst enquiries are undertaken.
- temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the [local authority/academy trust]

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

Definitions for outcomes of allegation investigations

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

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)

  Inform the accused member of staff, volunteer or other individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care

If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details

If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate

- The school will provide appropriate welfare and procedural support to any employee, volunteer, trainee, governor, contractor or agency worker who is the subject of an allegation, including

appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. There is additional support available to all employees through the Schools Advisory Service Wellbeing Employee Assistance Program.

- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

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

Additional considerations for supply teachers and all contracted staff

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

- we will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- the Governing body will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- we will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- we will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

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

Timescales

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

- any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- if the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- if a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

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

Specific actions

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

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

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

Unsubstantiated, unfounded, false or malicious reports
If a report is:

- determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. if they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations
If an allegation is:

- determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. if they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

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

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

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

Record-keeping

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

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

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

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

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

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer and volunteer references, we will:

- not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious.
- include substantiated allegations, provided that the information is factual and does not include opinions
- Where appropriate, factual information relating to substantiated safeguarding concerns involving volunteers may be shared with organisations requesting safeguarding references, in line with data protection requirements.

All references will be accurate, fair, objective and comply with relevant employment and data protection requirements.

Learning lessons

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

- issues arising from the decision to suspend the member of staff, volunteer or other individual
- the duration of the suspension
- whether or not the suspension was justified
- the use of suspension when the individual is subsequently reinstated. we will consider how future investigations of a similar nature could be carried out without suspending the individual
- whether any changes are required to staff, volunteer, contractor, governor or trustee supervision, induction, training, safeguarding practice or procedures

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

Non-recent allegations

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

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

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

Section 2: Concerns that do not meet the harm threshold

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

Concerns may arise through, for example:

- suspicion
- complaint
- safeguarding concern or allegation from another member of staff
- disclosure made by a child, parent or other adult within or outside the school
- pre-employment vetting checks

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

Definition of low-level concerns

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

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

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

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

Sharing low-level concerns

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

We will create this culture by:

- ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- empowering staff to share any low-level concerns as per section 12 of this policy
- empowering staff to self-refer

- addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- helping to identify any weakness in the school's safeguarding system

At NRHS, staff are encouraged to raise low-level concerns at the earliest opportunity and should not feel that they need to determine whether behaviour meets a particular threshold before sharing it. Concerns should normally be raised directly and confidentially with the Headteacher. Where a concern relates to the Headteacher, it should be raised with the Executive Headteacher, and where it relates to the Executive Headteacher, it should be raised with the Chair of Governors in accordance with the procedures set out in this policy.

The Headteacher will consider low-level concerns raised and, where appropriate, consult with the DSL, Executive Headteacher and/or HR to determine what action is required. This may include seeking further information, providing advice or guidance, addressing professional conduct or boundaries, identifying training or support needs, or determining that the concern meets the threshold for consideration under the school's allegations procedures. Records will be maintained securely and confidentiality respected as far as reasonably possible.

Staff are encouraged to self-refer where they believe their own conduct may have fallen below expected professional standards, could be misinterpreted or may have compromised professional boundaries. The Headteacher and senior leaders will reinforce an open safeguarding culture through induction, safeguarding training, the Staff Code of Conduct and ongoing discussion of professional expectations. Low-level concerns will be reviewed where appropriate to identify patterns, recurring concerns or wider issues within the school's safeguarding culture or practice.

Responding to low-level concerns

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

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

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff code of conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

In responding to a low-level concern, the Headteacher will consider the context in which the behaviour occurred, any explanation provided by the individual concerned, whether the behaviour is consistent with the Staff Code of Conduct and whether there are any previous concerns relating to the individual. The response will be proportionate to the nature and circumstances of the concern.

Where the information indicates that the concern may meet the harm threshold for an allegation against a member of staff, the low-level concerns process will cease and the matter will be managed in accordance with the school's procedures for managing allegations against staff, including consultation with the Local Authority Designated Officer (LADO) where appropriate. Where there is uncertainty about whether the harm threshold has been met, advice will be sought from the LADO.

Where the concern remains below the harm threshold, appropriate action may include a conversation with the member of staff, clarification of expected professional conduct or boundaries, additional training, supervision or support, or management action under the school's relevant procedures where appropriate. The member of staff should normally be informed of the concern and any action being taken, unless there is a safeguarding or other legitimate reason not to do so at that stage.
The concern, the information considered, the Headteacher's decision, the rationale for that decision and any action taken will be recorded securely in accordance with the school's record-keeping arrangements. Low-

level concerns will be reviewed periodically and whenever a new concern arises to identify whether there is a pattern of behaviour which, considered collectively, may indicate a more significant safeguarding or conduct concern.

Record keeping

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

Records will be:

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

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

References

We will not include low-level concerns in references unless:

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