



#equippedforlife

The
Westgate School

Child Protection (Safeguarding) Policy

Date Approved by HT: September 2026

Date for Revision: September 2027 (or sooner if change in legislation)

Contents

Important Contacts	3
Statement of Intent	5
Statement of Principles	5
Legislation	6
Definitions	7
Equality Statement	8
Roles and Responsibilities:	8
The Designated Safeguarding Leader	10
The Governing Board	11
The Named Governor for Safeguarding, Child Protection and Children in Care	12
The Headteacher	12
Confidentiality	13
Recognising Abuse and Acting	14
FGM	15
Extremism	16
Mental Health	16
Low-Level Concerns	16
Allegations of Abuse made against other Students	17
Online Safety and the use of Mobile Technology	21
Artificial Intelligence (AI)	23
Notifying Parents/Carers	23
Students with Special Education Needs, Disabilities or Health Issues	23
Students with a Social Worker	24
Looked-After and Previously Looked-After Children	24
Complaints and Concerns about Safeguarding Policies	25
Record-Keeping	25
Training	26
The DSL and DDSL	27
Governors	27
Recruitment	27
Staff who have contact with Pupils and Families	27
Monitoring	28
Links	28
 Appendix	
 Appendix I: Types of Abuse	29
 Appendix II: Safer Recruitment and DBS Checks	33
 Appendix III: Allegations of Abuse made against Staff	38
 Appendix IV: Specific Safeguarding Issues	47

1. Important Contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Headteacher	Mr. J. Gargan	JGA@westgate.slough.sch.uk
Designated Safeguarding Leader (DSL)	Mr. S. Nosworthy	STN@westgate.slough.sch.uk
Deputy Designated Safeguarding Leader (DDSL)	Mrs. J. Bader	JBA@westgate.slough.sch.uk
Safeguarding Team	Mrs. D Hargrave Mr. T Cheema	DHA@westgate.slough.sch.uk TCH@westgate.slough.sch.uk
Designated Teacher for CLA	Mr. S Nosworthy	STN@westgate.slough.sch.uk
Local Authority Designated Officer (LADO)	Dawn Lisles	LADO@sloughchildrenfirst.co.uk 07927681858 / 01753 690906
Local Authority School Services	Zarine Power Samantha Da Costa Anjli Sidhu Donna Briggs Neil Hoskinson Sabi Hothi	Zarine.Power@slough.gov.uk Education Safeguarding Professional Samantha.dacosta@slough.gov.uk Senior CME & Attendance Officer Anjli.sidhu@slough.gov.uk Attendance & CME Lead Donna.briggs@slough.gov.uk Early Help Group Manager Neil.hoskinson@slough.gov.uk Associate Director for Education Sabi.hothi@slough.gov.uk Head of School Services
Co Chairs of Governors	Mrs Inderjit Dhillon Mrs Zarrin Hamid	idhillon@westgate.slough.sch.uk zhamid@westgate.slough.sch.uk

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated Governor for Safeguarding	Mr. K Sahota	ksahota@westgate.slough.sch.uk
Slough Children and Young People's Family Services	Slough Children First	Sloughchildren.referrals@scstrust.co.uk 01753 875362 / 01344 351999
Thames Valley Police	PC Louise Sloane PC Ranjit Benning	louise.sloane@thamesvalley.pnn.police.uk ranjit.benning@thamesvalley.pnn.police.uk
NSPCC	Whistleblowing Helpline	help@nspcc.org.uk 0800 028 0285
Child Exploitation and Online Protection Centre (CEOP)	National Helpline	0870 000 3344
PREVENT	National Referral Form PREVENT Gateway Team Lubna Hussain	Preventreferralslough@thamesvalley.pnn.police.uk 01865 555618 preventgateway@thamesvalley.pnn.police.uk 07970 145236 lubna.husain@thamesvalley.pnn.police.uk 07973 203091
Channel Helpline	National Helpline	020 7340 7264

2. Statement of Intent

- 2.1 Our aim is to do all we can to protect and safeguard the wellbeing of our students.
- 2.2 Children and young people have a fundamental right to be protected from harm and our students have the right to expect us to provide them with a safe and secure environment.
- 2.3 We acknowledge that teachers and other staff in our school are in a unique position to identify and to help abused and vulnerable children. We also recognise that the protection of our students is a shared community responsibility.
- 2.4 The Westgate School aims to ensure that:
 - 2.4.1 *appropriate action is taken in a timely manner to safeguard and promote children's welfare; and*
 - 2.4.2 *all staff are aware of their statutory responsibilities with respect to safeguarding; and*
 - 2.4.3 *staff are properly trained in recognising and reporting safeguarding issues.*

3. Statement of Principles

- 3.1 The Child Protection Policy applies to all in our school community, namely students, staff, governors, and volunteers.
- 3.2 There are five main elements to our policy:
 - 3.2.1 *Ensuring that we practice safer recruitment in checking the suitability of staff and volunteers to work with our students.*
 - 3.2.2 *Raising pupil awareness of child protection issues and equipping students with the skills they need to keep them safe.*
 - 3.2.3 *Developing, and then implementing, procedures for identifying and reporting cases, or suspected cases, of abuse, and training staff to use these procedures effectively.*
 - 3.2.4 *Supporting vulnerable students and those in difficult circumstances, as well as supporting those students who have been abused in accordance with their agreed protection plans.*
 - 3.2.5 *Establishing a safe environment in which children can learn and thrive.*
- 3.3. We recognise that school staff are well placed to observe the outward signs of abuse. We will therefore:
 - 3.3.1 *Establish and maintain an environment where our students feel safe and secure, and where they are encouraged to talk and are listened to seriously.*
 - 3.3.2 *Ensure that our students know that there are adults in the school whom they can approach if they are worried or in difficulty or concerned about one of their peers.*
 - 3.3.3 *Include opportunities in the curriculum for students to develop the skills to recognise abuse and to stay safe, and to include material to help students develop realistic attitudes to the responsibilities of adult life, particularly regarding childcare and parenting skills.*
 - 3.3.4 *Ensure that, wherever possible, every effort will be made to establish working relationships with families and with colleagues from other agencies.*
 - 3.3.5 *Challenge and empower staff to 'think the unthinkable' that 'it could happen here'.*
- 3.4 We recognise that it is the responsibility of each of us to ensure that all elements of this policy are actively and consistently reflected in our practice. We will systematically monitor, evaluate, and constantly review the impact of this policy.

4 Legislation

4.1 This Child Protection 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 local safeguarding partners.

4.2 This policy is also based on the following legislation:

- 4.2.1 *Section 175 of the Education Act (2002), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils.*
- 4.2.2 *The School Staffing (England) Regulations (2009), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques.*
- 4.2.3 *Part 3 of the schedule to the Education (Independent School Standards) Regulations (2014), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.*
- 4.2.4 *The Children Act (1989) (and 2004 amendment), which provides a framework for the care and protection of children.*
- 4.2.5 *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. In addition, statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.*
- 4.2.6 *The Rehabilitation of Offenders Act (1974), which outlines when people with criminal convictions can work with children.*
- 4.2.7 *Schedule 4 of the Safeguarding Vulnerable Groups Act (2006), which defines what 'regulated activity' is in relation to children.*
- 4.2.8 *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.*
- 4.2.9 *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 the rights which apply to individuals under the European Convention on Human Rights (ECHR).*
- 4.2.10 *The Equality Act (2010), which makes it unlawful to discriminate against people regarding protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and Headteacher should carefully consider how they are supporting their pupils regarding these characteristics. The Act allows our school to take positive action to deal with disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for pupils with disabilities. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment.*
- 4.2.11 *The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment, and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.*

4.3 This policy also complies with The Westgate School's funding agreement and articles of association.

5. Definitions

5.1 Safeguarding and promoting the welfare of children means:

5.1.1 providing help and support to meet the needs of children as soon as problems emerge.

5.1.2 protecting children from maltreatment, whether that is within or outside the home, including online

5.1.3 preventing the impairment of children's mental and physical health or development

5.1.4 ensuring that children grow up in circumstances consistent with the provision of safe and effective care

5.1.5 taking action to enable all children to have the best outcomes

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

5.3 Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix I explains the different types of abuse.

5.4 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. Appendix I defines neglect in more detail.

5.5 Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos, or live streams.

5.6 Children includes everyone under the age of 18.

5.7 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:

5.7.1 *The local authority (LA).*

5.7.2 *Integrated care boards (previously known as clinical commissioning groups) for an area within the LA.*

5.7.3 *The chief officer of police for a police area in the LA area.*

5.8 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.

5.9 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.

6. Equality Statement

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

6.2 We give special consideration to children who:

- 6.2.1 *have special educational needs and/or disabilities (SEND) or health conditions; or*
- 6.2.2 *are young carers; or*
- 6.2.3 *may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality; or*
- 6.2.4 *have English as an additional language; or*
- 6.2.5 *are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence; or*
- 6.2.6 *are at risk of FGM, sexual exploitation, forced marriage, or radicalisation; or*
- 6.2.7 *are asylum seekers; or*
- 6.2.8 *are at risk due to either their own or a family member's mental health needs; or*
- 6.2.9 *are looked after or previously looked after; or*
- 6.2.10 *are missing or absent from education for prolonged periods and/or repeat occasions; or*

6.2.10A Changes in attendance, including unexplained, persistent or unusual patterns of absence, may be an indicator of safeguarding concerns. Staff will exercise professional curiosity and consider whether changes in attendance indicate that a child may need help, support or protection.

- 6.2.11 *whose parent/carers has expressed an intention to remove them from school to be home educated.*

7. Roles and Responsibilities

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

7.2 The Westgate School plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia, and sexual violence/harassment. This will be underpinned by our:

- 7.2.1 *Behaviour Policy*
- 7.2.2 *Pastoral support system*
- 7.2.4 *Planned programme of relationships, sex, and health education (RSHE) within the Personal Development Curriculum, which is inclusive and delivered regularly, tackling issues such as:*
 - 7.2.4.1 *healthy and respectful relationships; and*
 - 7.2.4.2 *boundaries and consent; and*
 - 7.2.4.3 *stereotyping, prejudice, and equality; and*
 - 7.2.3.4 *body confidence and self-esteem; and*

- 7.2.3.5 *how to recognise an abusive relationship (including coercive and controlling behaviour); and*
- 7.2.3.6 *the concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support; and*
- 7.2.3.7 *what constitutes sexual harassment and sexual violence and why they're always unacceptable.*

7.3 All staff at The Westgate School will read and understand Part One of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education (KCSIE) 2026, and will review this guidance at least annually. The school will ensure appropriate mechanisms are in place to assist staff to understand and discharge their safeguarding responsibilities.

7.4 Staff who work directly with children are also expected to read annex B of KCSIE (about specific safeguarding issues), although we expect all our staff, including those who don't work directly with children, to read it too.

7.5 Staff at The Westgate School will also sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

7.6 The requirement to read Part One of KCSIE 2026 applies to all staff, including staff who do not work directly with children. Staff understanding of the guidance and their safeguarding responsibilities will be confirmed and refreshed at least annually.

7.7 Staff will 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'll be interacting with online).

7.8 Staff will provide a safe space for pupils who identify as LGBTQ+ to speak out and share their concerns.

7.9 All staff at The Westgate School will be aware of:

- 7.9.1 *The Westgate School's systems which support safeguarding, including this Child Protection Policy, the Staff Handbook, the role, and identity of the Designated Safeguarding Leader (DSL) and Deputy Designated Safeguarding Leader (DDSL), the Behaviour Policy, Online Safety Policy and the safeguarding response to children who go missing from education.*
- 7.9.2 *The 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.*
- 7.9.3 *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.*
- 7.9.4 *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 female genital mutilation (FGM), and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.*
- 7.9.5 *The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines).*
- 7.9.6 *The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.*

- 7.9.7 *That children can be at risk of harm inside and outside of their home, at school and online.*
- 7.9.8 *The fact that children who are (or who are perceived to be) lesbian, gay, bi, or trans (LGBTQ+) can be targeted by other children.*
- 7.9.9 *What to look for to identify children who need help or protection.*

7.10 The Designated Safeguarding Leader (DSL)

- 7.11 The DSL is a member of the Senior Leadership Team. Our DSL in the Senior Leadership Team is Steve Nosworthy (DSL)
- 7.12 The DSL lead responsibility for child protection and wider safeguarding in the school. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.
- 7.13 During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. The DSL can also be contacted out of school hours, if necessary, by email.
- 7.14 When the DSL is absent, the Deputy Designated Safeguarding Leads (DDSL) – Jemma Bader, and Safeguarding Team, Debbie Hargrave or Taj Cheema – will act as cover.
- 7.15 If the DSL and DDSL are not available, a colleague from the Safeguarding Team will act as cover (for example, during out-of-hours/out-of-term activities).
- 7.16 The DSL will be given the time, funding, training, resources, and support to:
 - 7.16.1 *provide advice and support to other staff on child welfare and child protection matters; and*
 - 7.16.2 *take part in strategy discussions and inter-agency meetings and/or support other staff to do so; and*
 - 7.16.3 *contribute to the assessment of children; and*
 - 7.16.4 *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; and*
 - 7.16.5 *have a good understanding of harmful sexual behaviour; and*
 - 7.16.6 *have a good understanding of the filtering and monitoring systems and processes in place at our school.*

The effectiveness of the school's filtering and monitoring provision will be reviewed at least annually. The review will involve the DSL, the senior leader with responsibility for filtering and monitoring, and appropriate IT expertise/service-provider input. The review, identified risks and resulting actions will be recorded and reported through the school's safeguarding governance arrangements.

- 7.17 The DSL will also:
 - 7.17.1 *keep the headteacher informed of any issues; and*
 - 7.17.2 *liaise with local authority case managers and designated officers for child protection concerns as appropriate; and*
 - 7.17.3 *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; and*

- 7.17.4 *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; and*
 - 7.17.5 *be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.*
- 7.18 The full responsibilities of the DSL and DDSL are set out in their job description.

7.18 The Governing Board

- 7.19 The governing board will:
- 7.19.1 *facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development; and*
 - 7.19.2 *evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation; and*
 - 7.19.3 *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; and*
 - 7.19.4 *appoint a senior board level (or equivalent) lead [or, link governor] to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL; and*
 - 7.19.5 *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; and*
 - 7.19.6 *ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:*
 - 7.19.6.1 *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; and*
 - 7.19.6.2 *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.*
- 7.20 The governing board will make sure:
- 7.20.1 *The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources, and support.*
 - 7.20.2 *Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies.*
 - 7.20.3 *The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place.*
 - 7.20.4 *The Westgate 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).*

- 7.20.5 *That the Child Protection Policy reflects those children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.*
- 7.20.6 *Where another body is providing services or activities (regardless of whether the children who attend these services/activities are children on the school roll):*
 - 7.20.6.1 *seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed; and*
 - 7.20.6.2 *make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate; and*
 - 7.20.6.3 *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.*
- 7.21 The Chair of Governors will act as the 'case manager' if an allegation of abuse is made against the Headteacher, where appropriate.
- 7.22 All governors will read Keeping Children Safe in Education in its entirety.
- 7.23 The Named Governor for Safeguarding, Child Protection and Children in Care**
- 7.24 The named 'Governor for Safeguarding, Child Protection and Children in Care' is Mr. K Sahota.
- 7.25 The individual is responsible for:
 - 7.25.1 *maintaining regular contact with the DSL; and*
 - 7.25.2 *awareness of current responsibilities and requirements in relation to child protection by attending appropriate professional development activities; and*
 - 7.25.3 *receiving reports from the Headteacher on safeguarding issues and communicating these to the governing body.*
- 7.26 The Headteacher**
- 7.27 The Headteacher is responsible for the implementation of this policy, including:
 - 7.27.1 *Ensuring that staff (including temporary staff) and volunteers:*
 - 7.27.1.1 *are informed of our systems which support safeguarding, including this policy, as part of their induction; and*
 - 7.27.1.2 *understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.*
 - 7.27.2 *Communicating this policy to parents/carers when their child joins the school and via the school website.*
 - 7.27.3 *Ensuring that the DSL has appropriate time, funding, training, and resources, and that there is always adequate cover if the DSL is absent.*
 - 7.27.4 *Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate.*
 - 7.27.5 *Making decisions regarding low-level concerns where appropriate, though they may wish to collaborate with the DSL and who may lead the investigation of any low-level concerns.*

8 Confidentiality

- 8.1 Timely information sharing is essential to effective safeguarding.
- 8.2 Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.
- 8.3 The Data Protection Act (2018) and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.
 - 8.3.1 From September 2026, the school will comply with the statutory information-sharing duty introduced by the Children's Wellbeing and Schools Act and the associated statutory guidance. Safeguarding information will be shared lawfully, proportionately and without unnecessary delay where this is necessary to safeguard or promote the welfare of a child. Data protection law will not be treated as a barrier to appropriate safeguarding information sharing.
- 8.4 If staff need to share 'special category personal data', the Data Protection Act (2018) contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk.
- 8.5 Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.
- 8.6 If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
 - 8.6.1 *There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies.*
 - 8.6.2 *The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.*
 - 8.6.3 *The DSL should consider that:*
 - 8.6.3.1 *Parents or carers should normally be informed (unless this would put the victim at greater risk).*
 - 8.6.3.2 *The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care.*
 - 8.6.3.3 *Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged*

perpetrator is under 10, the starting principle of referring to the police remains.

8.7 Regarding anonymity, all staff will:

- 8.7.1 *Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.*
- 8.7.2 *Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved.*
- 8.7.3 *Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.*

8.8 The government's information sharing advice for safeguarding practitioners includes seven 'golden rules' for sharing information and will support staff who must make decisions about sharing information.

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

9 Recognising Abuse and Acting

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

9.2 If a child is suffering or likely to suffer harm, or in immediate danger, staff should make a referral to children's social care and/or the police immediately. Anyone can make a referral. Staff should tell the DSL as soon as possible if they make a referral directly.

9.3 If a child discloses a safeguarding issue to a member of staff, they should:

- 9.3.1 *Listen to and believe them, allowing time to talk freely. Do not ask leading questions.*
- 9.3.2 *Stay calm and do not show that you are shocked or upset.*
- 9.3.3 *Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.*
- 9.3.4 *Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.*
- 9.3.5 *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.*
- 9.3.6 *Sign and date the write-up and pass it 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. 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.*

9.4 Staff should bear in mind that some children may:

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

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

- 9.6 If staff at The Westgate School have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger), staff should make a disclosure using our Child Protection Online Monitoring System (CPOMS) if they have any concerns about a child's welfare.
- 9.7 If in exceptional circumstances the DSL/DDSL is not available, this should not delay appropriate action being taken. Speak to a member of the Safeguarding Team, Senior Leadership Team and/or take advice from local authority children's social care. Staff can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Staff should share details of any actions taken with the DSL as soon as practically possible.
- 9.8 If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.
- 9.9 The DSL will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.
- 9.10 The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if a situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.
- 9.11 If it is appropriate to refer a case to local authority children's social care or the police, the DSL will make the referral. If staff make a referral directly, they must tell the DSL as soon as possible.
- 9.12 The local authority will decide within one working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.
- 9.13 If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.
- 9.14 Female Genital Mutilation (FGM)**
- 9.15 Keeping Children Safe in Education (KCSIE) explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs". FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'. Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in Appendix IV of this policy.
- 9.16 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.

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

9.18 Extremism

- 9.19 Where there is a concern about extremism, staff at The Westgate School should make a disclosure using CPOMS. 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 susceptible to radicalisation and at risk of becoming involved in terrorism, or the local authority children's social care team.

- 9.20 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. Staff can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

- 9.21 In an emergency, staff should call 999 or the confidential anti-terrorist hotline on 0800 789 321 if they:

9.19.1 *Think someone is in immediate danger; or*

9.19.2 *Think someone may be planning to travel to join an extremist group; or*

9.19.3 *See or hear something that may be terrorist-related.*

- 9.22 Inform the DSL or deputy as soon as practically possible after a referral has been made.

9.23 Mental Health

- 9.24 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.

- 9.25 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.

- 9.26 If staff have a mental health concern about a child that is also a safeguarding concern, and they should take immediate action by disclosing this concern on CPOMS.

- 9.27 Staff can refer to the Department for Education guidance on mental health and behaviour in schools for more information about identifying possible mental health problems.

9.28 Low-Level Concerns

- 9.29 If staff have concerns about a member of staff (including a supply teacher, volunteer, or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer, or contractor) posing a risk of harm to children, procedures set out in the Low-Level Concerns Policy will be followed, if appropriate.
- 9.30 Where staff believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer, or contractor), they should report it directly to the local authority designated officer (LADO).
- 9.31 If The Westgate School receives an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, we will follow our school safeguarding policies and procedures, informing the LADO, as we would with any safeguarding allegation.

9.32 Allegations of Abuse made against other Students

- 9.33 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.
- 9.34 We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.
- 9.35 Most cases of pupils hurting other pupils will be dealt with under our school’s Behaviour Policy, but this Child Protection Policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:
- 9.35.1 *is serious, and potentially a criminal offence; or*
 - 9.35.2 *could put pupils in the school at risk; or*
 - 9.35.3 *is violent; or*
 - 9.35.4 *involves pupils being forced to use drugs or alcohol; or*
 - 9.35.5 *involves sexual exploitation, sexual abuse, or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes).*
- 9.36 See Appendix IV for more information about child-on-child abuse.
- 9.37 If a pupil makes an allegation of abuse against another pupil:
- 9.37.1 *Staff must record the allegation on CPOMS to alert the DSL, but do not investigate it.*
 - 9.37.2 *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.*
 - 9.37.3 *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).*
 - 9.37.4 *The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.*

- 9.38 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.
- 9.39 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.
- 9.40 To achieve this, The Westgate School will:
- 9.40.1 *challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images; and*
 - 9.40.2 *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; and*
 - 9.40.3 *ensure our curriculum helps to educate pupils about appropriate behaviour and consent; and*
 - 9.40.4 *ensure pupils can easily and confidently report abuse using our reporting systems; and*
 - 9.40.5 *ensure staff reassure victims that they are being taken seriously; and*
 - 9.40.6 *be alerted 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; and*
 - 9.40.7 *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; and*
 - 9.40.8 *consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment; and*
 - 9.40.9 *ensure staff are trained to understand:*
 - 9.40.9.1 *how to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports; and*
 - 9.40.9.2 *that even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”; and*
 - 9.40.9.3 *that if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:*
 - 9.40.9.3.1 *children can show signs or act in ways they hope adults will notice and react to; or*
 - 9.40.9.3.2 *a friend may make a report; or*
 - 9.40.9.3.3 *a member of staff may overhear a conversation; or*
 - 9.40.9.3.4 *a child’s behaviour might indicate that something is wrong.*

- 9.40.9.4 *that certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation; and*
 - 9.40.9.5 *that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy; and*
 - 9.40.9.6 *the important role that staff must play in preventing child-on-child abuse and responding where they believe a child may be at risk from it; and*
 - 9.40.9.7 *that staff should speak to the DSL if they have any concerns; and*
 - 9.40.9.8 *that social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s), and friends from either side.*
- 9.41 The DSL will work with the Senior Leadership Team in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.
- 9.42 Disciplinary action can be taken while other investigations are going on, e.g., by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, considering whether:
- 9.42.1 *acting would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this; or*
 - 9.42.2 *there are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing.*
- 9.43 If staff are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), they must report it to the DSL immediately using CPOMS. Staff must not:
- 9.43.1 *View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if they have already viewed the imagery by accident, they must report this to the DSL).*
 - 9.43.2 *Delete the imagery or ask the pupil to delete it.*
 - 9.43.3 *Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility).*
 - 9.43.4 *Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers.*
 - 9.43.5 *Say or do anything to blame or shame any young people involved.*
- 9.44 Staff should explain that they need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.
- 9.45 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:
- 9.45.1 *whether there is an immediate risk to pupil(s); and*
 - 9.45.2 *if a referral needs to be made to the police and/or children's social care; and*

- 9.45.3 *if it is necessary to view the image(s) to safeguard the young person (in most cases, images or videos should not be viewed); and*
 - 9.45.4 *what further information is required to decide on the best response; and*
 - 9.45.5 *whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown); and*
 - 9.45.6 *whether immediate action should be taken to delete or remove images or videos from devices or online services; and*
 - 9.45.7 *any relevant facts about the pupils involved which would influence risk assessment; and*
 - 9.45.8 *if there is a need to contact another school, college, setting or individual; and*
 - 9.45.9 *whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved).*
- 9.46 The DSL will make an immediate referral to police and/or children's social care if:
- 9.46.1 *the incident involves an adult; and*
 - 9.46.2 *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 SEND); and*
 - 9.46.3 *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; and*
 - 9.46.4 *the imagery involves sexual acts and any pupil in the images or videos is under 13; and*
 - 9.46.5 *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).*
- 9.47 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 Child Protection Policy.
- 9.48 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 and 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.
- 9.49 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.
- 9.50 If it is necessary to refer an incident to the police, this will be done through using a 'police intel form' and liaise with PC Louise Sloane – Designated School Officer – or by dialling 101.
- 9.51 All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

9.52 Pupils at The Westgate School are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our Personal Development Curriculum and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

9.52.1 *what it is; and*

9.52.3 *how it is most likely to be encountered; and*

9.52.3 *the consequences of requesting, forwarding, or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment; and*

9.52.4 *issues of legality; and*

9.52.5 *the risk of damage to people's feelings and reputation.*

9.53 Pupils also learn the strategies and skills needed to manage:

9.53.1 *specific requests or pressure to provide (or forward) such images; and*

9.53.2 *the receipt of such images.*

9.54 This Child Protection Policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

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

9.56 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 will:

9.56.1 *put systems in place for pupils to confidently report abuse; and*

9.56.2 *ensure our reporting systems are well promoted, easily understood and easily accessible for pupils; and*

9.56.3 *make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback.*

9.57 Reporting systems for pupils include, but is not limited to:

9.57.1 *promoting speaking to a trusted adult(s) in terms of who they should report concerns to; and*

9.57.2 *making pupils aware of the reporting systems and processes, e.g., through discussion through the Personal Development Curriculum; and*

9.57.3 *highlighting 'worry@westgate.slough.sch.uk' to disclose a concern, that also provides reassurances following a disclosure to help ensure that pupils feel safe.*

9.57.4 *receiving feedback through surveys from all stakeholders of the school community, including students, to enhance our approach to safeguarding and reporting systems.*

10 Online Safety and the use of Mobile Technology

10.1 The Westgate School recognises 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.

10.2 To address this, our school aims to:

10.2.1 *have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers, and governors; and*

- 10.2.2 *protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones'); and*
 - 10.2.3 *set clear guidelines for the use of mobile phones for the whole school community; and*
 - 10.2.4 *establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.*
- 10.3 The Westgate School's approach to online safety is based on addressing the following categories of risk:
- 10.3.1 *Content – being exposed to illegal, inappropriate, or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, and extremism.*
 - 10.3.2 *Contact – being subjected to harmful online interaction with other users, such as child-to-child 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.*
 - 10.3.3 *Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending, and receiving explicit images (e.g., consensual, and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.*
 - 10.3.4 *Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.*
- 10.4 To meet our aims and address the risks above, The Westgate School will:
- 10.4.1 *Educate pupils about online safety as part of our curriculum. For example:*
 - 10.4.1.1 *the safe use of social media, the internet and technology; and*
 - 10.4.1.2 *keeping personal information private; and*
 - 10.4.1.3 *how to recognise unacceptable behaviour online; and*
 - 10.4.1.4 *how to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim.*
 - 10.4.2 *Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year. This will be documented.*
 - 10.4.3 *Educate parents/carers about online safety via our website, communications sent directly to them and during Parents' Evenings and through workshops delivered as*

part of the personal development curriculum. We will also share clear procedures with them, so they know how to raise concerns about online safety.

- 10.4.4 *Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:*
 - 10.4.4.1 *Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present; and*
 - 10.4.4.2 *Staff will not take pictures or recordings of pupils on their personal phones or cameras.*
- 10.4.5 *Make all pupils, parents/carers, staff, volunteers, and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology.*
- 10.4.6 *Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones, as per The Westgate School's Behaviour Policy.*
- 10.4.7 *Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation.*
- 10.4.8 *Put in place robust filtering and monitoring systems to limit children's exposure to the four key categories of risk from the school's IT systems.*
- 10.4.9 *Conduct an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.*
- 10.4.10 *Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, to continue to provide them with the relevant skills and knowledge to safeguard effectively.*
- 10.4.11 *Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.*
- 10.4.12 *For full details about our school's policies related to online safety and mobile phone use, please refer to our policies which can be found on our website.*

10.5 Artificial Intelligence (AI)

10.5.1 The school recognises that generative AI can create or amplify safeguarding risks, including exposure to harmful or inappropriate content, misinformation, manipulation or grooming, privacy and data risks, the creation or alteration of sexual or abusive imagery, and attempts to circumvent filtering and monitoring. These risks will be considered within online-safety education, staff training and the school's filtering and monitoring risk assessment.

- 10.6 Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils, and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.
- 10.7 The Westgate School recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g., bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.
- 10.8 The Westgate School will treat any use of AI to access harmful content or bully pupils in line with this policy and our Behaviour policy.
- 10.9 Staff should be aware of the risks of using AI tools whilst they are still being developed and should conduct risk assessments for any new AI tool being used by the school in-line with our school policy related to AI.

10.10 Staff follow the DfE's guidance on the use of generative AI in schools, and any use will be reviewed by the DSL and senior leaders to assess safeguarding, data protection, and bias risks.

11 Notifying Parents/Carers

- 11.1 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. Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.
- 11.2 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.
- 11.3 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 collaborate with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.
- 11.4 The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):
 - 11.4.1 *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.*
 - 11.4.2 *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).*

12 Students with Special Education Needs, Disabilities or Health Issues

- 12.1 We recognise that pupils with SEND, or certain health conditions can face additional safeguarding challenges, and are three times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:
 - 12.1.1 *assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration; or*
 - 12.1.2 *pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils; or*
 - 12.1.3 *the potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; or*
 - 12.1.4 *communication barriers and difficulties in managing or reporting these challenges.*
- 12.2 We offer extra pastoral support for these pupils. This includes:
 - 12.2.1 *bespoke individual passports through the SEND/Pastoral Department; and*
 - 12.2.2 *utilising external agencies and specialist support i.e., Youth Worker, SALT etc.; and*
 - 12.2.3 *focused CPD on specific students and strategies to support; and*
 - 12.2.4 *signposting students to engage with support through the personal development curriculum and promoting engagement with programmes/initiatives.*

- 12.3 Any abuse involving pupils with SEND will require close liaison with the DSL, DDSL, Safeguarding Team and the SENDCo (who is also on the Safeguarding Team for greater triangulation).

13 Students with a Social Worker

- 13.1 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.
- 13.2 The DSL and all members of staff will work with and support social workers to help protect vulnerable children.
- 13.3 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:
- 13.3.1 *Responding to unauthorised absence or missing education where there are known safeguarding risks.*
- 13.3.2 *The provision of pastoral and/or academic support.*

14 Looked-After and Previously Looked-After Children

- 14.1 We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. We will ensure that:
- 14.1.1 *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; and*
- 14.1.2 *The DSL has details of children's social workers and relevant virtual school heads.*
- 14.2 We have appointed a Designated Teacher – Miss. Nia Root – who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.
- 14.3 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:
- 14.3.1 *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; and*
- 14.3.2 *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.*

15 Complaints and Concerns about Safeguarding Policies

- 15.1 If there are concerns regarding the way that The Westgate School safeguards pupils – including poor or unsafe practice, or potential failures – procedures for reporting include:
- 15.1.1 *contacting the Local Authority Designated Officer (LADO); or*
 - 15.1.2 *contacting the NSPCC whistle-blowing helping on 0800 028 0285.*
- 15.2 It should be communicated:
- 15.2.1 *what areas of malpractice or wrongdoing are covered by the procedures; and*
 - 15.2.2 *the options available for reporting a concern, including who to approach within the school and externally and*
 - 15.2.3 *how the school will respond to such concerns; and*
 - 15.2.4 *what protection is available to staff who report another member of staff.*
- 15.3 Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see Appendix III).

16 Record-Keeping

Safeguarding records will clearly document the concern, the action taken, decisions made, the rationale for those decisions, and the outcome. Records will be accurate, contemporaneous, secure and sufficiently detailed to support continuity of safeguarding practice.

- 16.1 We will hold records in line with our records retention schedule.
- 16.2 All safeguarding concerns, discussions, decisions made and the reasons for those decisions, will be recorded electronically using CPOMS or paper-based (depending on context). If you are in any doubt about whether to record something, discuss it with the DSL.
- 16.3 Records will include:
- 16.3.1 *a clear and comprehensive summary of the concern; and*
 - 16.3.2 *details of how the concern was followed up and resolved; and*
 - 16.3.3 *a note of any action taken, decisions reached and the outcome.*
- 16.4 Concerns and referrals will be kept in a separate child protection file for each child.
- 16.5 Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

- 16.6 Safeguarding records relating to individual children will be retained for a reasonable period after they have left the school.
- 16.7 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.
- 16.8 To allow the new school/college to have support in place when the child arrives, this should be within:
- 16.8.1 *5 days for an in-year transfer, or within the first 5 days of the start of a new term.*
- 16.9 In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.
- 16.10 Appendix II sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks.
- 16.11 Appendix III sets out our policy on record-keeping with respect to allegations of abuse made against staff.

17 Training

- 17.1 All staff members will undertake safeguarding and child protection training at induction and periodically, including on whistle-blowing procedures, online safety and CPOMS to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This will be documented.
- 17.2 This training will be regularly updated and will:
- 17.2.1 *be integrated, aligned, and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning; and*
- 17.2.2 *be in line with advice from the 3 safeguarding partners; and*
- 17.2.3 *include online safety, including an understanding of the expectations, roles, and responsibilities for staff around filtering and monitoring; and*
- 17.2.4 *have regard to the Teachers' Standards to support the expectation that all teachers:*
- 17.2.4.1 *manage behaviour effectively to ensure a good and safe environment; and*
- 17.2.4.2 *have a clear understanding of the needs of all pupils.*

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

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

17.5 Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

17.6 Volunteers will receive appropriate training, if applicable.

17.7 The DSL and DDSL

17.8 The DSL and DDSL will undertake child protection and safeguarding training at least every two years, including Prevent awareness training.

17.9 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).

17.20 Governors

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

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

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

17.23 Recruitment

17.24 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, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

17.25 Please refer to Appendix II of this policy for more information about our safer recruitment procedures.

17.26 Staff who have contact with Pupils and Families

17.27 All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

18 Monitoring

18.1 This policy will be reviewed by the Deputy Headteacher who is responsible for The Westgate School's Safeguarding in conjunction with the Safeguarding Team – notably the DSL/DDSL –

at the beginning of each academic year. At every review, it will be shared with the Governors and approved by the Full Governing Board.

The annual review will explicitly check this policy against the current edition of Keeping Children Safe in Education, Working Together to Safeguard Children, current Prevent guidance, current DfE filtering and monitoring standards, and applicable statutory information-sharing guidance.

19 Links with Policies

19.1 This policy is linked to, but not exclusively or extensively, to The Westgate School's:

- 19.1.1 *Parent's Handbook*
- 19.1.2 *Staff Handbook*
- 19.1.3 *Low-Level Concerns Policy*
- 19.1.4 *Behaviour Policy*
- 19.1.5 *The Westgate School's Attendance Policy*
- 19.1.6 *Complaints Policy*
- 19.1.7 *Online Safety Policy*
- 19.1.8 *Equality and Inclusion*
- 19.1.9 *PSHE/RSE Policy*
- 19.1.10 *Teaching and Learning Policy*
- 19.1.11 *Whistleblowing Policy*
- 19.1.12 *Data Protection Policy*
- 19.1.13 *SEND Policy*
- 19.1.14 *School Lettings Policy*

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix I: Types of Abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

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

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

Emotional abuse may involve:

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

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 the child is aware of what is happening. The activities may involve:

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

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

Sexual Harassment

Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment.

Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive, or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- *Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, and calling someone sexualised names; or*
- *Sexual "jokes" or taunting.*

Abusive sexual activity included any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

Sharing photos, videos and live streams online is part of daily life for many children and young people, enabling them to share their experiences, connect with friends and record their lives.

Sharing nudes and semi-nudes means the sending or posting online of nude or semi-nude images, videos, or live streams by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums, or done offline between devices via services like Apple's AirDrop.

The term 'nudes' is used as it is most recognised by young people and more appropriately covers all types of image-sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

The motivations for taking and sharing nudes and semi-nudes are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- *children and young people find nudes and semi-nudes online and share them claiming to be from a peer; or*
- *children and young people digitally manipulate an image of a young person into an existing nude online; or*
- *images created or shared are used to abuse peers e.g., by selling images online or obtaining images to share more widely without consent to publicly shame.*

'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm. It is now a criminal offence.

Under the Voyeurism Act, upskirting offenders can now be arrested, face up to two years in prison and have their name placed on the sex offenders register if caught upskirting.

Sexual Imagery (previously sexting) is youth produced sexual imagery which places children in danger. Any student found with sexual imagery on their mobile devices must have these removed in the presence of their parent/carer and both child and parent sign a statement to say the image has been removed. This will remain on the student's file.

Young perpetrators who abuse may use coercive techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality, or the threat of these regardless of victim resistance.

Staff should report any incidents of sexual harassment using CPOMS and The Westgate School's Safeguarding Team will ensure that the alleged victim is supported and that a detailed action plan allows the claims to be rigidly investigated.

All incidents involving youth produced sexual imagery will be responded to as follows:

- *The incident will be referred to the DSL immediately by a member of staff using CPOMS. The DSL will hold an initial review meeting with appropriate staff. If appropriate, there will be subsequent interviews with the young people involved.*
- *Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.*
- *At any point in the process, if there is a concern a young person has been harmed or is at risk of harm a referral will be made to children's social care and/or the police immediately in accordance with this policy.*

In some instances, it may be necessary to refer the matter to the police. Once a report is made to the police, the report must be recorded, and the police will investigate. This may include seizure of devices and interviews with the young people involved.

The UK Council for Internet Safety updated its advice for managing incidences of sharing nudes and semi-nudes in December 2020 – UKCIS advice 2020. The school will have regard to this advice when managing these issues.

Inappropriate sexual behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person.

To determine the nature of an incident more fully, the following factors will be given consideration. The presence of exploitation in terms of:

- *Equality – differentials of physical, cognitive, and emotional development, power and control and authority, passive and assertive tendencies; and*
- *Consent – agreement including all the following:*
 - *Understanding that is proposed based on age, maturity, development level, functioning and experience; and*
 - *Knowledge of society's standards for what is being proposed; and*
 - *Awareness of potential consequences and alternatives; and*
 - *Assumption that agreements or disagreements will be respected equally; and*
 - *Voluntary decision; and*
 - *Mental competence.*

Developmental sexual activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional, and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. it may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child or young person has been exposed.

If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

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 because of maternal substance abuse.

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

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

Appendix II: Safer Recruitment and DBS Checks – Policy and Procedures

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 two 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 can share relevant information and discuss it at interview stage. The information we will ask for includes:*
 - o *If they have a criminal history.*
 - o *Whether they are included on the barred list.*
 - o *Whether they are prohibited from teaching.*
 - o *Information about any criminal offences committed in any country in line with the law as applicable in England and Wales.*
 - o *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 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 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:*
 - o *For all staff, including teaching positions: criminal records checks for overseas applicants.*
 - o *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.*
- *Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state (management positions are most likely to include, but are not limited to, Headteachers, principals and Deputy/Assistant Headteachers).*

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/Student 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

We will:

- *Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity. From 1 September 2026, the previous supervision exemption from regulated activity has been removed. Where an unpaid person carries out teaching, training, instruction, care or supervision of children and the statutory frequency/period conditions are met, the activity may be regulated activity even where the person is supervised. The school will determine the appropriate enhanced DBS and barred-list checks in accordance with KCSIE 2026 and current DBS requirements.*
- *Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity.*
- *Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment.*

Governors, Trustees and Members

All trustees, local governors and members 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).

The Chair of the Board will have their DBS check countersigned by the secretary of state.

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); and*
- *identity; and*
- *right to work in the UK; and*
- *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 III: Allegations against Staff

This section is based on 'Section 1: Allegations that may meet the harm threshold' in part 4 of Keeping Children Safe in Education.

It also relates to The Westgate School's Low-Level Concerns Policy and applies to all cases in which it is alleged that a current member of staff, including a supply teacher, 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 The Westgate School is in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

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

A 'case manager' will lead any investigation. This will be the Headteacher, Chair of Governors [in independent schools: proprietor] where the Headteacher is the subject of the allegation or an assigned member of the Senior Leadership Team/Safeguarding Team. The case manager will be identified at the earliest opportunity.

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

All extended and off-site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements as per our Educational Trips Policy. Where extended school activities are provided by and managed by the school, our own Child Protection Policy and procedures apply. When our pupils attend off-site activities, including day and residential visits and work-related activities, we will check that effective child protection arrangements are in place.

If other organisations provide services or activities on our site on behalf of our school, we will check that they have appropriate procedures in place, including safer recruitment procedures. 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 encounter the individual, making it clear that this is not a punishment and parents/carers have been consulted.*
- *Temporarily redeploying the individual to another role in a different location.*

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.
- If appropriate, 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 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 one 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** regarding 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.
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. For example, the support available to individuals in our context, such as who they can turn to for advice, includes the NEU trade union representatives Mrs. Vince Katts or a colleague.
- 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 or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- *We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome.*
- *The governing board 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 considered (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, considering 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 file for the duration of the case.

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

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

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

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

We will retain all records at least until the accused individual has reached normal pension age.

References

When providing employer references, we will:

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

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.*
- *The duration of the suspension.*
- *Whether or not the suspension was justified.*
- *The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.*

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

Non-Recent Allegations

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

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

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

Section 2: Concerns that do not meet the Harm Threshold

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education and 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. This is related to our Low-Level Concerns Policy.

Concerns may arise through, for example:

- *Suspicion; or*
- *Complaint; or*
- *Safeguarding concern or allegation from another member of staff; or*
- *Disclosure made by a child, parent, or other adult within or outside the school; or*
- *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; or*
- *Having favourites; or*
- *Taking photographs of children on their mobile phone; or*
- *Engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or*
- *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; and*
- *Empowering staff to share any low-level concerns; and*
- *Empowering staff to self-refer; and*
- *Addressing unprofessional behaviour and supporting the individual to correct it at an early stage; and*
- *Providing a responsive, sensitive, and proportionate handling of such concerns when they are raised; and*
- *Helping to identify any weakness in the school's safeguarding system.*

Responding to Low-Level Concerns

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

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

The Headteacher will liaise with the Senior Leadership Team and/or Safeguarding Team to use the information collected to categorise the type of behaviour and determine any further action, in line with the school's Staff Handbook. The Headteacher will be the ultimate decision-maker in respect of all low-level concerns, though will collaborate with the DSL.

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 by 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.*

Appendix IV: Specific Safeguarding Issues

Children who are Absent from 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; or*
- *Are at risk of forced marriage or FGM; or*
- *Come from Gypsy, Roma, or Traveller families; or*
- *Come from the families of service personnel; or*
- *Go missing or run away from home or care; or*
- *Are supervised by the youth justice system; or*
- *Cease to attend a school; or*
- *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, it should be report through CPOMS and 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.

Child Criminal Exploitation

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

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- *Appearing with unexplained gifts or new possessions; or*
- *Associating with other young people involved in exploitation; or*
- *Suffering from changes in emotional wellbeing; or*
- *Misusing drugs and alcohol; or*

- *Going missing for periods of time or regularly coming home late; or*
- *Regularly missing school or education; or*
- *Not taking part in education; or*

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

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs around the country using dedicated mobile phone lines.

Children and vulnerable adults are exploited to move, store, and sell drugs and money, with offenders often using coercion, intimidation, violence, and weapons to ensure compliance of victims.

County lines exploitation can occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child. This power imbalance can be due to the same range of factors.

Children can be targeted and recruited into county lines in several locations, including schools and colleges. Indicators of county lines include those indicators set out under CCE, with the main indicator being missing episodes from home and/or school. Additional specific indicators that may be present where a child is criminally exploited include children who:

- *go missing and are subsequently found in areas away from home; or*
- *have been the victim or perpetrator of serious violence (e.g., knife crime); or*
- *are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs; or*
- *are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection; or*
- *are found in accommodation with which they have no connection or in a hotel room where there is drug activity; or*
- *owe a 'debt bond' to their exploiters; or*
- *have their bank accounts used to facilitate drug dealing.*

Child Sexual Exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased

status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

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

If a member of staff suspects CSE, they will make a disclosure using CPOMS. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child-on-Child Abuse

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

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

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

- *Bullying (including cyber-bullying, prejudice-based and discriminatory bullying); or*
- *Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse'); or*

- *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); or*
- *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); or*
- *Sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may be standalone or part of a broader pattern of abuse; or*
- *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; or*
- *Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery); or*
- *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; or*
- *Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).*

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will report this on CPOMS.

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

Domestic Abuse

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

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

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development, and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of Operation Encompass – if your local force is not, check your local procedures and adapt if necessary.

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

Mental Health

Mental health is explicitly included in the definition of safeguarding in KCSIE, which now includes "preventing impairment of children's mental and physical health or development."

Only appropriately trained professionals should attempt to make a diagnosis of a mental health condition. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

The Westgate School have a designated Mental Health Leader and fully trained Mental Health First Aiders (MHFA) on our staff. The Westgate School have formulated a mental health strategy to support students and have signposted support through posters, the personal development curriculum and academic curriculum.

Any concerns should be reported using CPOMS. Urgent concerns should be reported verbally immediately to a member of the Safeguarding Team and followed up at the earliest convenience on CPOMS.

The Westgate School have fulfilled all obligations and requirement by central Government that all schools in England should have a Senior Mental Health team in place by 2025.

Supporting Students with Medical Conditions

At The Westgate School, we ensure children with medical conditions are properly supported so that they remain healthy and have full access to education including school trips and physical education to achieve their academic potential.

We consult and communicate with health and social care professionals, students, and parents to make certain that the needs of children with medical conditions are properly understood and effectively supported. Individual health care plans are completed and maintained in the student's medical file, ready to be easily always accessed. Relevant medical information about students is communicated to all staff, in a confidential manner, to make sure they are fully aware of their medical needs and the children are monitored and cared for, both inside and outside the classroom.

Care is taken to follow policies and procedures in maintaining records of ongoing medical care, appointments, first-aid, and medication (dosage and time of administering). In certain cases, where there might be long-term absence related to the medical condition/illness, steps are put in place to ensure the reintegration back to school is properly supported keeping their emotional and general well-being in mind and limiting the impact on education.

Necessary medical information is gathered before a student goes on a school trip and they are accompanied by trained staff who are equipped with first aid kits and any emergency medication needed to care for the students.

Supporting Students with Physical Impairments

Should students require physiotherapy or occupational therapy, the Berkshire Healthcare Foundation NHS physiotherapist and Occupational Therapist will inform us of the relevant plans.

Information is also obtained at the time of transition from the students' primary schools. Visits are made to the primary schools to gain first-hand knowledge of how the students have been previously supported and to ascertain if any medical training is required before the student starts at The Westgate School.

Staff who complete physio plans with our students with PI are required to be signed off by the NHS physiotherapist. With reference to our Physically impaired students, we consult and communicate with health professional and parents to make certain that the needs of said students are fully understood and the students are effectively supported in all aspects of the school day.

If our students with PI are attending a school trip and require LSA support, an individual risk assessment is done by the SEND Department prior to the trip and all relevant paperwork is shared with the trip organiser and LSA on the day of departure.

Modern Slavery Act

Modern slavery is a criminal offence under the Modern Slavery Act (2015) and encompasses slavery, servitude, human trafficking and forced labour, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

If staff have any concerns about modern slavery, they must report this on CPOMS.

Homelessness

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

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

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

Young Carers

It is the responsibility of the DSL and DDSL to keep a record of those students who play the part of a major carer for a family member. However, such families do not often publicise their situation for fear of social care involvement.

We offer a support package to these students appropriate to their individual situation. This package would contain elements of the support offered to students looked after by the local authority.

So-called 'Honour-Based' Abuse (including FGM and Forced Marriage)

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

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

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

FGM

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

The procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM is for a disclosure to be made using CPOMS.

Indicators that FGM has already occurred include:

- *A pupil confiding in a professional that FGM has taken place; or*
- *A mother/family member disclosing that FGM has been carried out; or*
- *A family/pupil already being known to social services in relation to other safeguarding issues; or*
- *A girl:*
 - *Having difficulty walking, sitting, or standing, or looking uncomfortable; or*
 - *Finding it hard to sit still for long periods of time (where this was not a problem previously); or*
 - *Spending longer than normal in the bathroom or toilet due to difficulties urinating; or*
 - *Having frequent urinary, menstrual or stomach problems; or*
 - *Avoiding physical exercise or missing PE; or*
 - *Being repeatedly absent from school, or absent for a prolonged period; or*
 - *Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour; or*
 - *Being reluctant to undergo any medical examinations; or*
 - *Asking for help, but not being explicit about the problem; or*
 - *Talking about pain or discomfort between her legs.*

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

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

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

Forced Marriage

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

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

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

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

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

Preventing Radicalisation

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Terrorism** is an action that:
 - Endangers or causes serious violence to a person/people; or
 - Causes serious damage to property; or
 - Seriously interferes or disrupts an electronic system.

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

Schools have a duty to prevent children from being drawn into terrorism. The Prevent Duty requires all schools to "have due regard to the need to prevent people being drawn into terrorism", under the Counter-Terrorism and Security Act (2015). The duty covers all types of extremism, whether political, religious, or ideological.

As per the Home Office's updated Prevent Duty guidance from 31st December 2023, The Westgate School's designated staff member to oversee Prevent is the DSL.

The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

The government website Educate Against Hate and charity NSPCC says that signs that a pupil is being radicalised and staff will be alerted to changes in pupils' behaviour, which can include:

- *refusal to engage with, or becoming abusive to, peers who are different from themselves; or*
- *becoming susceptible to conspiracy theories and feelings of persecution; or*
- *Changes in friendship groups and appearance; or*
- *Rejecting activities that they used to enjoy; or*
- *converting to a new religion; or*
- *isolating themselves from family and friends; or*
- *talking as if from a scripted speech; or*
- *an unwillingness or inability to discuss their views; or*
- *a sudden disrespectful attitude towards others; or*
- *increased levels of anger; or*
- *increased secretiveness, especially around internet use; or*
- *expressions of sympathy for extremist ideologies and groups, or justification of their actions;*
or
- *accessing extremist material online, including on Facebook or Twitter; or*
- *possessing extremist literature; or*
- *being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.*

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

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

Channel is a key element of the Prevent strategy. It is a multi-agency approach to protect people at risk from radicalisation. Channel uses existing collaboration between local authorities, statutory partners (such as the education and health sectors, social services, children's and youth services and offender management services), the police and the local community to:

- *Identify individuals susceptible to radicalisation and at risk of becoming involved in terrorism; and*
- *Assess the nature and extent of that risk; and*
- *Develop the most appropriate support plan for the individuals concerned.*

Channel is about safeguarding children and adults from being drawn into committing terrorist-related activity. It is about early intervention to protect and divert people away from the risk they face before illegality occurs. Channel is one tactical option employed by Prevent and has recently been placed on a statutory footing.

The Westgate School protects our pupils from the risk of radicalisation, as part of our wider safeguarding duties and duty to promote the spiritual, moral, social, and cultural development of pupils to reduce permissive environments. To do this, our school:

- *promotes the fundamental British values in our academic and personal development through a broad and balanced curriculum, by teaching about: democracy; the rule of law; individual liberty and mutual respect and tolerance of different faiths and beliefs; and*
- *promotes the spiritual, moral, cultural, and mental (SMCM) and physical health of our pupils; and*
- *ensures that our school is a safe space for pupils to discuss sensitive topics, including terrorism and extremism; and*
- *ensures that we have robust safeguarding procedures to identify children at risk; and*
- *engage with our local authority's risk assessment to determine the potential risk of individuals being drawn into terrorism in your local area; and*
- *will have measures in place to protect pupils from harmful online content, including setting up appropriate filtering and monitoring systems at school and at home; and*
- *make sure staff receive training to help them identify pupils at risk, challenge extremist ideas, and know how to act if they have a concern; and*
- *ensures that anyone working in, with or on behalf of the school has been subject to the appropriate level of checks prior to employment or engagement.*

If staff are concerned about a pupil, they will make a disclosure using CPOMS and discuss their concerns with the DSL. Staff should always act if they are worried.

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

Sexual Violence and Sexual Harassment between Children in Schools

Sexual violence and sexual harassment can occur:

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

Sexual violence and sexual harassment exist on a continuum and may overlap.

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

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

When supporting victims, staff will:

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

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual, and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- *Challenging inappropriate behaviours; and*
- *Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up; and*
- *Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts, and genitalia, pulling down trousers, flicking bras and lifting skirts. Dismissing or tolerating such behaviours risks normalising them.*

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will make a disclosure using CPOMS.

Serious Violence

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

- *Increased absence from school; or*
- *Change in friendships or relationships with older individuals or groups; or*
- *Significant decline in performance; or*
- *Signs of self-harm or a significant change in wellbeing; or*
- *Signs of assault or unexplained injuries; or*
- *Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above)).*

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

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

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this using CPOMS.

Checking the Identity and Suitability of Visitors

All visitors will be required to verify their identity to the satisfaction of staff as per our External Visitors Policy.

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

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

Visitors 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 always accompanied by a member of staff. 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.

Non-Collection of Children

If a child is not collected at the end of the session/day, we will set out the school procedures in a separate policy, that will include information on contacting parents/carers, who will look after the child and how the incident will be recorded.

Missing Pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible, we will set out in a separate policy, the school procedures if a child goes missing, that will include information on contacting parents/carers, who will look after the child and how the incident will be recorded.