MOSAIC
SCHOOLS LEARNING TRUST

SAFEGUARDING AND CHILD PROTECTION POLICY

All schools in Mosaic Schools Learning Trust are committed to safeguarding and promoting the welfare of children and young people and expect all staff and volunteers to share this commitment.

Unicorn
PRIMARY SCHOOL

Staff Responsible:	Head Teacher
Date of Review:	September 2026
Date of Next Review:	September 2027

SUMMARY OF CHANGES	
Date	Change
Sept 2025	Updated in line with KCSIE 2025
Sept 2026	Updated in line with KCSIE 2026 and Information sharing Duty 2026

Contents:

1. Key Persons and Contacts
2. Roles and Responsibilities
3. Aims
4. Legislation and Statutory Guidance
5. Definitions
6. Equality Statement
7. Confidentiality
8. Recognising Abuse and Taking Action
9. Community-based Early Help and Targeted Early Help level of Family Help
10. Referral
11. Concerns about Extremism
12. Mental Health and Wellbeing Concerns
13. Promoting the Wellbeing of Children
14. Pupils with SEND or Health Issues
15. Pupils with a Social Worker
16. Pupils who are Lesbian, Gay, Bisexual or Gender Questioning
17. Concerns around Adults in School
18. Allegations made against Other Pupils
19. Sharing of Nude Photographs (or Semi-nudes)
20. Reporting Systems for our Pupils
21. Online Abuse and Cybercrime
22. Notifying Parents
23. Complaints and Concerns about School Safeguarding Practices
24. Training
25. Monitoring
26. Links with Other Policies

Appendices:

1. Types of Abuse
2. Safer Recruitment and DBS Checks – Policy and Procedure
3. Allegations of Abuse made against Staff - Policy and Procedure
4. Specific Safeguarding Issues
5. Safeguarding Considerations for Remote Education
6. Children Adopted from Care
7. Information Sharing
8. Flow Chart of Actions
9. Filtering Standards for Mosaic Schools – Current
10. Additional Advice and Support

1. Key Persons and Contacts

Unicorn Primary School:

Designated Safeguarding Leads:

- Victoria Elvines – Head Teacher
- Clare Bevan – Assistant Head/Inclusion Lead

Deputy Designated Safeguarding Lead:

- Dee Davis – SenCo Assistant

Link Member of Local Governing Body

- Hilary Coupe

Senior Mental Health Lead:

- Rebecca Strong

School telephone number: 020 8658 0282
General email: unicorn@mslt.org.uk
Safeguarding email: safeguarding@unicorn.mslt.org.uk

Mosaic Schools Learning Trust:

- Andrea Harris – CEO
- Wendy Giles – Executive Head
- Marie Powell – Trustee with responsibility for Safeguarding mariepowell@mslt.org.uk

AGENCY	CP TEAM	ROLE	CONTACT DETAILS
Bromley Children's Safeguarding Partnership	Gemma Taylor	Local Authority Designated Safeguarding Lead (LADO)	020 8461 7669/07850921631 (via Bromley Safeguarding Children's Board) Lado2@bromley.gov.uk (general enquiries) lado@bromley.gcsx.gov.uk (secure email)
Bromley Children's Safeguarding Partnership	Libby Kember	Senior Education Safeguarding Officer	libby.kember@bromley.gov.uk 0208 313 4665
Bromley Safeguarding Nursing Team	Team Leader Michelle Owen Unicorn Dawn Smith	School Nurse Health Advisor (SCPHN) Linked school nurse	m.owen1@nhs.net 07784 362699 dawn.smith20@nhs.net 0300 330 5777
Metropolitan Police (South BCU)	Dave Stringer	Chief Superintendent, South BCU (Croydon, Bromley and Sutton Boroughs)	www.met.police.uk dave.stringer@met.police.uk 0207 230 1212
Bromley Integrated Care Board	Dr Angela Bhan	Executive Director	020 8176 5330 broccg.contactus@nhs.net www.bromleyccg.nhs.uk

Bromley Council (Children's Services)	Richard Baldwin	Director of Children's Services Includes: Children's Social Care and Education	Richard.Baldwin@bromley.gov.uk 020 8313 4062
Bromley Local Authority Bromley Council	Jared Nehra	Director of Education	jared.nehra@bromley.gov.uk 020 8313 4501
Bromley Children and families Hub; previously Multi-Agency Safeguarding Hub (MASH) (Includes Early Help)			Office hours: 020 8461 7373/ 7379 candfhub@bromley.gov.uk Out of Hours 030 0303 8671
Bromley Virtual School	Sally Kelly	Head of the Virtual School	Virtual.school@bromley.gov.uk
Prevent Duty			National Prevent advice line: 0800 01103764 Report extremism in schools 020 7340 7264 Counter.terrorism@education.gsi.gov.uk

2. Roles and Responsibilities

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

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

- Behaviour and Relationships policy
- Online Safety and Use of AI policies
- Pastoral support system
- Planned programme of Relationships, Sex and Health Education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
    - Healthy and respectful relationships
    - Boundaries and consent
    - Stereotyping, prejudice and equality
    - Body confidence and self-esteem
    - How to recognise an unhealthy relationship (including coercive and controlling behaviour)
    - What constitutes sexual harassment and sexual violence and why they are always unacceptable

The Board of Trustees has an overarching role in ensuring that policies, procedures and training in MOSAIC schools are effective and comply with the law at all times. The Trust's over-arching statement on Safeguarding and Child Protection is available on the website (www.mosaicschoolslearningtrust.org), but it is the responsibility of all schools within the Trust to develop their own policy to encompass the Trust's ethos.

The Local Governing Boards (LGB)

The Governing Boards will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development.
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Head Teacher to account for its implementation.
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements

- Appoint a link governor (Hilary Coupe) to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.
- Make sure:
    - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support.
    - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, trainee teachers, volunteers and contractors).
    - That this policy reflects that, children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.
    - 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.
    - The school has appropriate filtering and monitoring systems in place.
    - The DfE's filtering and monitoring standards are reviewed, and discussed with IT staff and service providers about what needs to be done to support the school to meet these standards.
    - The DSL takes lead responsibility for understanding the filtering and monitoring systems and process in place in school.
    - All staff are aware of and understand the filtering and monitoring systems in place, manage them effectively and know how to escalate concerns.
    - Online safety and safe use of AI is a running and interrelated theme within the whole-school approach to safeguarding and related policies.
- Where another body is providing services or activities on the school premises (regardless of whether or not the children who attend these services/activities are children on the school roll), the LGB will:
    - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed.
    - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate.
    - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

The Chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the Head Teacher, where appropriate (see appendix 3).

All governors will read Keeping Children Safe in Education in its entirety.

Designated Safeguarding Lead

At Unicorn we have two DSLs and one DDSL (deputy). The DSLs are members of the senior leadership team. Our DSLs are Victoria Elvines/Head Teacher and Clare Bevan/Assistant Head Teacher. The DSLs take 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. Our DDSL is Dee Davis SENCo Assistant.

The DSLs/DDSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- Contribute to the assessment of children.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.
- Have a good understanding of harmful sexual behaviour.
- Have a good understanding of the filtering and monitoring systems and processes in place at our school.

The DSLs/DDSL will also:

- Keep the head teacher informed of any issues.
- Liaise with local authority case managers and designated officers for child protection concerns, as appropriate.
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies.
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support.
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.
- Keep written records of all concerns, discussions and decisions, including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program.

The full responsibilities of the DSLs and deputy are set out in their job description.

During term time, a DSL will be available during school hours for staff to discuss any safeguarding concerns. BASC leads are trained at DSL level and have access to the DSLs at all times.

The Safeguarding Team can be contacted out of hours, if necessary, using the designated safeguarding email: safeguarding@unicorn.mslt.org.uk

In the event of both DSLs being offsite, the deputy will act as cover. In exceptional circumstances, the DSL may be contacted via Teams.

The Children and Families Hub Out of Hours Team or Childline can be contacted in event of a member of staff being uncontactable.

Head Teacher

The Head Teacher must ensure that there is DSL in post and must ensure that up-to-date records relating to Child Protection and Safeguarding are kept.
Other responsibilities include:

- Ensuring that staff (including temporary staff) and volunteers:
  - Are informed of our systems which support safeguarding, including this policy, as part of their induction.
  - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse, neglect and exploitation.
- Communicating this policy to parents when their child joins the school and via the school website.
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3).
- Ensuring the relevant staffing ratios are met where applicable, for example, the ratios specific to early years' provision.
- Ensuring that each child in the EYFS is assigned a key worker.
- Overseeing the safe use of technology, mobile phones and cameras in the early years' setting.
- Making decisions regarding all low-level concerns, although they may wish to collaborate with the DSL on this.

Virtual School Heads

The role of the Virtual School Head Teacher is to promote the educational outcomes of children in care, previously in care and children with a social worker. Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of all pupils with a social worker. They should also identify and engage with key professionals, e.g. DSLs, Special Educational Needs Co-ordinators (SENCOs),

social workers, mental health leads and others. Bromley's Virtual Head details can be seen in the Contacts section above.

All Staff

All staff will be made aware of where this policy is available on the school system (Staff Share (T:Drive)/Policies/New from September 2026). They are made aware each time the policy is reviewed and updated.
In addition, all staff will read and understand Parts 1 and Annex B of the Department for Education's statutory safeguarding guidance, (Keeping Children Safe in Education 2026), and review this guidance at least annually.
All staff will sign a declaration at the beginning of each academic year to confirm that they have reviewed the guidance and read the updated version of the policy.
Staff new to the school are expected to read both the policy and KCSIE upon joining and will sign the appropriate documentation to say they have done so.

Staff will reinforce the importance of online safety when communicating with parents and care givers. This includes making parents aware of what we ask children to do online e.g. sites they need to visit or who they will be interacting with online.

Staff will 'create a culture' where all pupils can speak out or share any concerns with them.

All staff will be aware of:

- Our systems which support safeguarding, including this Child Protection and Safeguarding Policy, the staff Code of Conduct *and* the role of the designated safeguarding lead (DSL) and deputies, the Behaviour and Relationships Policy, the Online Safety Policy, safe use of AI policy and the safeguarding response to children who go missing from education.
- Unicorn Primary School's policy around staff and pupil mobile phones.
- The targeted family early help process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, harmful sexual behaviour or sexual violence, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child

sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation, and serious violence (including that linked to county lines) and these are rarely standalone and often overlap.

- New and emerging threats, including online harms, grooming, sexual exploitation, criminal exploitation, radicalisation and the role of technology and social media in presenting harm, including through generative AI.
- Previously looked after children who potentially remain vulnerable. All staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.
- Young Carers, how to identify and support them.
- The importance of reassuring victims that they are being taken seriously and will be supported and kept safe.
- The fact that children can be at risk of harm inside and outside of their home, at school and online.
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or gender questioning (LGBTQ+) can be targeted by other children.
- That a cautious approach should be taken for gender questioning children, considering the broad range of the individual's needs in partnership with their parents (except in rare circumstances where involving parents would bring a significant risk of harm to the child). There should be regard for any clinical advice that is available and consider how to address wider vulnerabilities, such as the risk of bullying. (As a school, we await government guidance, expected in September 2025, and will act upon this as appropriate.)
- What to look for to identify children who need help or protection.
- Children not feeling ready or knowing how to tell someone that they are being abused, exploited or neglected. They may not recognise their experiences as harmful, and may feel embarrassed, humiliated, or may be being threatened. Staff should determine how best to build trusted relationships with children and young people which facilitate communication.
- That a child and their family may be experiencing multiple needs at the same time

See below for more detail on how staff are supported to do this.

Volunteers

Volunteers and work experience students who work in Unicorn Primary School will be provided with guidance on Safeguarding and Child Protection issues. This will include, but not

be limited to, knowing who the DSLs are and how to report a concern to a member of staff, acceptable use of IT resources and personal devices, expected behaviour and conduct of adults working with pupils.

3. Aims

We aim to ensure that:

- Appropriate action is taken in a **timely manner** to safeguard and promote children's welfare.
- All staff are aware of their **statutory responsibilities** with respect to safeguarding.
- Staff are properly **trained in recognising and reporting** safeguarding issues.
- All staff are aware of how **GDPR regulations** operate alongside sharing safeguarding information with other agencies.

We will be succeeding when:

- All staff have received appropriate training in child protection issues and procedures, including online safety.
- All staff throughout the academic year have Prevent training and FGM training, are alert to the signs and know who to contact in the event of a concern.
- All staff receive regular safeguarding updates.
- When all staff receive Online-Safety training and understand potential serious violence linked to county lines.
- We have a culture among all staff of listening to children and taking account of their wishes and feelings.
- All child protection concerns are dealt with promptly and recorded appropriately.
- Information is promptly and carefully assessed and passed to relevant statutory agencies.
- All staff have read and understood **Part 1** of Keeping Children Safe in Education (DfE) annually and are aware of specific safeguarding issues.
- All staff know the process to make a referral to social care and to seek the support of the DSL or DDSL if the DSL is unavailable.
- We create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- All staff are aware of escalating a concern as outlined in BSCB Escalating Concerns policy and adhere to the Mosaic Whistleblowing Policy.
- All Designated Officers undergo formal child protection training every two years (in line with LCSB) and receive regular (annual) safeguarding refreshers (e.g. via e-bulletins)
- All staff have received Cyber security training

- An at least sufficient number of staff are qualified as 'first aider at work' and or 'Paediatric first aiders'.
- We ensure that children are taught about safeguarding in an age-appropriate way (in-line with DfE guidance).
- Appropriate filters and appropriate monitoring systems are in place to safeguard children from potential harmful and inappropriate online material, and staff understand their expectations, roles and responsibilities in relation to these. The DSL has responsibility for understanding the systems in place in school.

4. Legislation and statutory guidance

This policy is based on the Department for Education'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 procedures set out by our local safeguarding children's board, which includes what contextual safeguarding is and the implications on children.

This policy is also based on the following legislation:

- 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.
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children.
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children.
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children.
- 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.
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 and Childcare Act 2006 which set out who is disqualified from working with children.
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.
- General Data Protection Legislation 2018

- Teaching Online Safety in School 2019 this guidance from the DfE outlines how schools can ensure their pupils understand how to stay safe and behave online as part of forthcoming and existing curriculum requirements.
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and Head Teacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they are being disproportionately subjected to sexual violence or harassment.
- 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, bi-phobic or transphobic bullying, or racial discrimination.
- Working Together to Improve School Attendance includes information on how schools should work with local authority children's services where school absence indicates safeguarding concerns.
- DfE Statutory guidance regarding the new Information Sharing Duty that comes into effect of 30th September 2026. Information sharing to safeguard children and young people – Gov.UK

This policy also complies with our funding agreement and articles of association.

5. Definitions

Safeguarding and promoting the welfare of children means:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment whether that is within or outside the home, including online
- Preventing impairment of children's mental or physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to prevent specific children who are suspected to be suffering, or being likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Making and/or Sharing of nudes and semi-nudes (also known as 'sexting' or 'youth produced sexual imagery') is where children create and/or share nude or semi-nude images, videos or live streams. This also includes pseudo-images made with the use of computer technology and those that are generated with the use of AI.

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.

Children includes everyone under the age of 18, including babies.

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

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms; however, we use the term "**instigator**" as in some cases, abusive behaviour can be harmful to the instigator too. We will decide what is appropriate and which terms to use on a case-by-case basis.

The following **three safeguarding partners** are identified in KCSIE (2026) and defined in the Children's 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:

- Bromley LA/Croydon LA (or any other local authority in which the child resides)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA.
- The chief officer of police for a police area in the LA area.

6. Equality Statement

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.

We give special consideration to children who:

- Have special educational needs or disabilities, or health conditions.
- Are young carers.
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality.
- Have English as an additional language.
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- Are at risk of FGM, sexual exploitation, forced marriage or radicalisation.
- Are asylum seekers.
- Are at risk due to either their own or a family member's mental health needs.
- Are looked-after, or have previously been looked after.
- Are missing from education for prolonged periods and/or repeat occasions.
- Whose parent/carer has expressed an intention to remove them from school to be home educated.

7. Confidentiality

It is important that all staff and volunteers feel confident that they will be supported if they have to deal with a safeguarding issue. It is also vital that the confidentiality of parents and pupils is respected. Staff will be mindful that:

- Timely information sharing is essential to effective safeguarding.
- 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.
- The Data Protection Act (DPA) 2018, the Data (use and access) Act 2025 and UK GDPR do not prevent or limit the sharing of information for the purposes of keeping children safe.
- If staff need to share 'special category data', the DPA 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.
- Information must be shared on a 'need-to-know' basis, but you do not need consent to share information if a child is suffering, or is at risk of, serious harm, or withholding will impinge the support or progress of a child.
- Staff should never promise a child that they will not tell anyone about an allegation, as this may not be in the child's best interests.

- Confidentiality is also addressed in this policy with respect to record-keeping, see below, and allegations of abuse against staff in Appendix 3.
- Egress or password protected documents should be used where possible.
- If a victim asks the school not to tell anyone about sexual violence or sexual harassment:
  - There's no definitive answer, because, even if a victim does not consent to sharing information, staff may still lawfully share it if there is another legal basis under the UK GDPR that applies.
  - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.
  - The DSL should consider that:
    - Parents or carers should normally be informed (unless this would put the victim at greater risk)
    - 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
    - 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 instigator is under 10, the starting principle of referring to the police remains.
- Regarding anonymity, all staff will:
  - 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.
  - 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.
  - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.
- The government's guidance regarding the new information sharing duty Information sharing to safeguard children and young people – GOV.UK will support staff who have to make decisions about sharing information.
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

Staff, governors and trustees will use the DfE's data protection guidance for schools to help ensure we:

- Comply with data protection law
- Develop data policies and processes

- Know what staff and pupil data to keep
- Follow good practices for preventing personal data breaches

8. Recognising Abuse and Taking Action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation. They should be alert to the potential need for early help for a child who:

- Is disabled
- Has special educational needs (whether or not they have a statutory education health and care plan - EHCp)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour-based' abuse such as female genital mutilation or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Has experienced multiple suspensions and is at risk of or has been permanently excluded from schools.
- Attends an alternative provision or a pupil referral unit

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue. Please note – in this and subsequent sections, any references to the DSL mean "the DSL (or deputy DSL)".

If a child is in immediate danger

A referral to children's social care and/or the police should be made **immediately** if a child is in immediate danger or at risk of harm. **Anyone can make a referral.**

Staff should tell the DSL/DDSL as soon as possible if they make a referral directly. A referral direct to the local authority can be made at:

https://www.bromley.gov.uk/children-families/reporting-child-abuse

https://www.bromleysafeguarding.org/

or via the NSPCC website at:

https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/report/

If a child makes a disclosure

If a child discloses a safeguarding issue,I ncluding non-recent abuse, staff should:

- Always take the disclosure seriously.
- Listen to them carefully; allow them time to talk freely and do not ask leading questions.
- Stay calm and not show that they are shocked or upset.
- Tell the child they have done the right thing in speaking out.
- Explain what will happen next and that this information will have to be passed on. Not promise to keep it a secret. Bear in mind that some children may:
    - Not feel ready or know how to tell someone that they are being abused, exploited or neglected.
    - Not recognise their experiences as harmful.
    - Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.
- Write up the conversation as soon as possible in the child's own words. Stick to the facts, and do not put their own judgement on it. Teaching staff, support staff and admin staff will record on CPOMs and inform a DSL of the record. Visitors (including supply teachers), site staff and volunteers will record on paper, ensuring they sign and date the report and pass it on to the DSL.
- Return to the safeguarding team within 24 hours to ensure that they are notified of action and have access to emotional support if required.

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

All children should feel supported and kept safe, and never made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment.

If a member of staff discovers that FGM has taken place or a pupil is at risk of FGM

The Department for Education's Keeping Children Safe in Education 2026 explains that FGM (female genital mutilation) 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 4.

Any teacher who either:

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

must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow local safeguarding procedures.

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.

Any member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been carried out or discovers that a pupil or student over the age of 18 appears to have been a victim of FGM should speak to the DSL and follow local safeguarding procedures. (sibling, work experience student).

If a member of staff has concerns about a child (*as opposed to* believing a child is suffering or likely to suffer from harm, or is in immediate danger)

See flowchart below and at Appendix 9

Signs that should always be a cause for concern may be changes such as:

- Difficulty concentrating and not doing as well at school
- Becoming withdrawn
- Mood or behaviour changes, for example:
    - Becoming more irritable
    - Being angry
    - Aggressive behaviour
    - Clinginess
    - Attention-seeking behaviour
    - 'Acting out'
    - Tiredness
    - Mental health needs, for example, signs of depression, anxiety, eating disorders or post-traumatic stress disorder (PTSD)
    - Self-harming
    - Risk-taking behaviour, for example:
        - Stealing
        - Bullying
        - Running away
        - Sexual activity
        - Trespassing or vandalism
        - Fighting
        - Truancy
        - Using drugs or alcohol, especially if they did not before

Remember: be professionally curious. If you see something that does not feel right, no matter how small, report it to the DSL.

Flowchart of Actions where there are Concerns about a Child

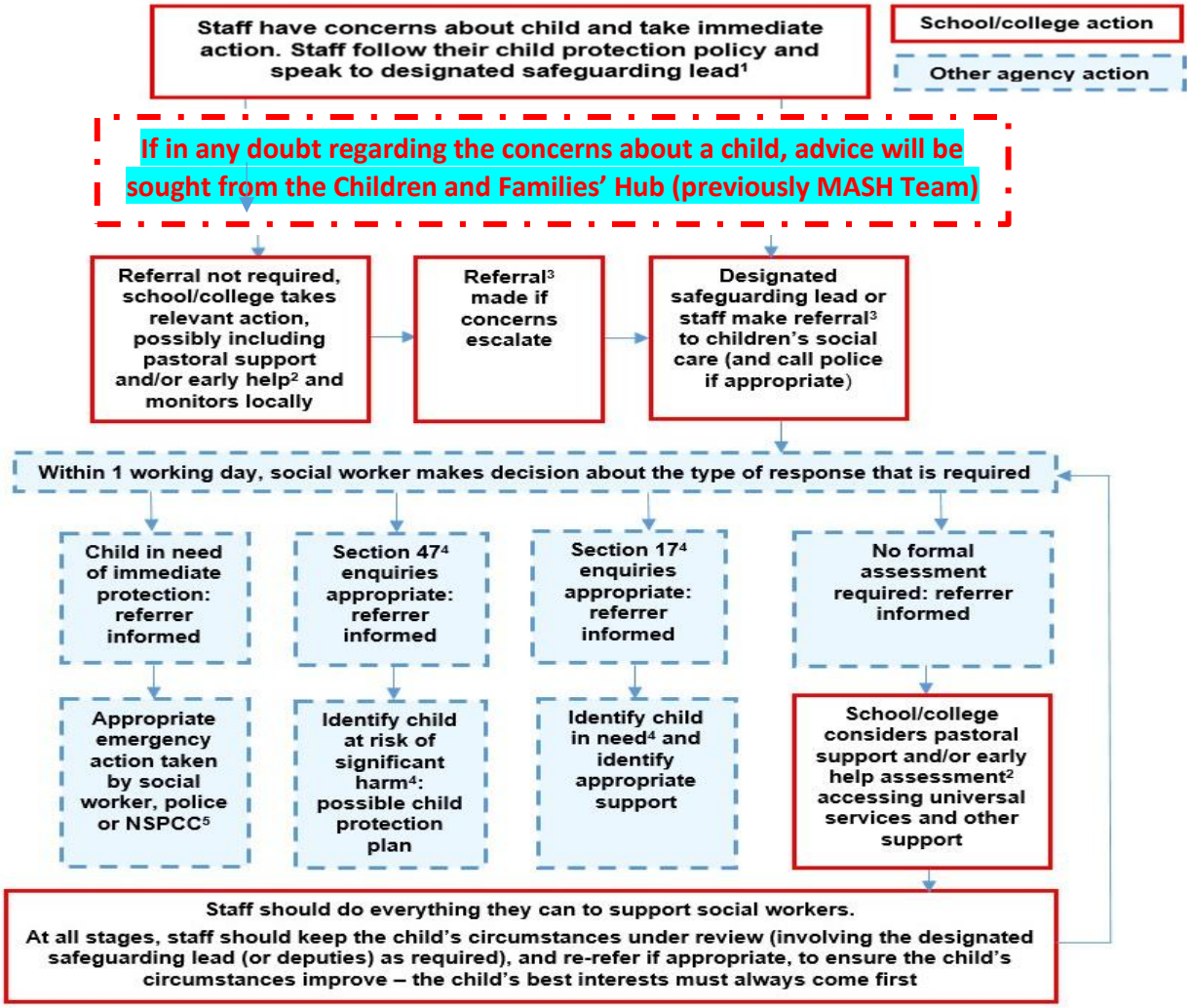


Figure 1 (above and Appendix 8) illustrates the procedure to follow if you have concerns about a child's welfare and the child ***is not in immediate danger***.

Where possible, they should speak to the DSL first to agree a course of action. Alternatively, a referral can be made to local authority children's social care directly (see 'Referral' below).

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or 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. Share details of any actions you take with the DSL as soon as practically possible.

9. Community-based Early Help and Targeted Early Help level of Family Help

Community-based early help is support for children of all ages that improves a family's resilience and outcomes, or reduces the chance of a problem getting worse. If Targeted Early Help level of Family Help is appropriate, the DSL/DDSL will support you in liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in a Targeted Early Help Level of Family Help assessment. In most cases the DSL/DDSL will act as the lead practitioner.

The school will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment as part of local arrangements. A referral for Targeted Early Help Level of Family Help is made via the safeguarding portals and usually triaged by a social worker.

The DSL/DDSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed and reported to the LA team.

10.Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL/DDSL will make the referral or support you to do so.

If a member of staff makes a referral directly, they must tell the DSL/DDSL as soon as possible and record the incident promptly.

The local authority children's social care to determine whether any of the children involved are in need of protection or other services. The local authority should make a decision within *1 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.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must contact the local authority and make sure the case is reconsidered to ensure the concerns have been addressed and the child's situation improves.

If a member of staff was unhappy about the course of action taken by social care and believe that the child remains at risk of harm, they should speak to a DSL about the procedure for escalation.

We follow Bromley/Croydon's protocols on referring a child for a safeguarding matter. Please visit:
https://www.bromleysafeguarding.org
https://www.croydon.gov.uk/children-young-people-and-families/child-protection-and-safeguarding/croydon-safeguarding-children-partnership

11.Concerns about Extremism

If a child is not at immediate risk of harm, where possible, a member of staff should speak to the DSL first to agree a course of action.

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

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

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

In an emergency, call 999 or the confidential anti-terrorist hotline on **0800 789 321** if you:

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

Staff at Unicorn have annual Prevent training.

12.Mental Health or Wellbeing Concerns

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.

All 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. All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

If staff have a mental health concern about a child that is also a safeguarding concern, they will take immediate action by:

- contacting the DSL or member of safeguarding team.
- Recording their concerns on CPOMs

Support available

Where appropriate, the school will:

- Work with the child and their family to access support from mental health services
- Provide pastoral support through our Learning Mentors, Nurture Groups and play therapy
- Work with external agencies such as CAMHS (Child and Adolescent Mental Health Services)
- In Bromley, the first contact for CAMHS referrals is the iSPA at Bromley Y

Ensuring mental health interventions are safe

The school will make sure that any mental health interventions we offer are:

- Safe and appropriate for the child's needs
- Delivered by appropriately trained staff
- Monitored and reviewed regularly
- Part of a coordinated approach with other agencies where appropriate

If a child is in immediate danger

If staff believe that a child is in immediate danger due to mental health concerns (for example, if a child is expressing suicidal thoughts or has seriously self-harmed), they must:

1. **Stay with the child** and ensure they are safe
2. **Call 999 immediately** if the child is in immediate physical danger
3. **Take the child to A&E** if they have seriously self-harmed or are at immediate risk
4. **Contact the DSL immediately** (or a member of the Safeguarding Team if the DSL is unavailable)
5. **Contact the child's parents/carers** (unless doing so would place the child at greater risk)

Staff should not leave a child alone if they believe they are at immediate risk of harm.

13.Promoting the Wellbeing of Children

The school will teach children about safeguarding in order that they can recognise when they are at risk and how to get help when they need it. At Unicorn Primary School, through various teaching and learning opportunities as part of providing a broad and balanced curriculum, the children will be taught about various aspects of safeguarding including online safety and strategies to support their personal wellbeing. These learning opportunities are planned within our PSHE, RSHE and Online Safety curriculums, assembly curriculum and through the use of appropriate expert visitors.

14. Pupils with Special Education Needs, disabilities or Health issues or who are Young Carers

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions or who are Young Carers can face additional safeguarding challenges and that these children can be more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils.

Additional barriers can exist when recognising abuse, neglect and exploitation in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
- The potential for pupils with SEND or certain health conditions or are Young Carers being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges.
- Cognitive understanding – for example: being unable to understand the difference between right and wrong, appropriate and inappropriate behaviours, fact and fiction in online content; and then repeating the content/behaviours in schools or the consequences of doing so.

We offer extra support for these pupils. This may include:

- Learning Mentor
- Support from the SENCO Assistant
- Nurture Groups/ social skills groups
- Outside agency therapeutic support
- Support plans and risk assessments, with vulnerabilities identified (including on an EHCP if a child has one)

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

15.Pupils with a Social Worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.
The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

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

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

Looked After and Previously Looked-After Children

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

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads
- We have appointed a designated teacher, the Inclusion Lead, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.
- The Inclusion Lead is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

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

16.Pupils who are Lesbian, Gay, Bisexual or Gender Questioning

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

Unicorn Primary School will work with parents and children, following the guidance set out in KCSIE 2026, when considering actions and support for children who a questioning their gender.

17. Concerns Around Adults in School (about a staff member or volunteer, contractor, supply teacher or trainee teacher)

Concerns about a member of staff (including a contractor, trainee teacher, supply teacher or volunteer), or an allegation made about a member of staff (including a contractor, supply teacher, trainee teacher or volunteer) posing a risk of harm towards a child/children, should be reported to the Head Teacher as soon as possible.
Concerns about a contractor, trainee teacher or supply teacher should be shared with their employers.

Concerns about the DSL should be brought to the attention of the Head Teacher.

Concerns about the Head Teacher, should be taken to the Chair of Governors who will follow the procedures set out in Appendix 3, in line with Trust procedures if appropriate.

The Head Teacher/ DSL/EHT will then follow the procedures set out in Appendix 3, in line with Trust procedures, if appropriate.

Following Bromley safeguarding procedures, the school will inform the LADO / Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

If there is believed to be a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) to the head teacher, it should be reported directly to the local authority designated officer (LADO).

In the event of an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, school safeguarding policies and procedure will be followed.

18. Allegations of Abuse made against Other Pupils (Child-on-Child Abuse)

We recognise that children are capable of abusing other children, and that children with SEND are 3 times more likely to be abused than their peers. Abuse will never be tolerated or passed off as “banter” or “part of growing up” as this can lead to a culture of

unacceptable behaviours and an unsafe environment for pupils. Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the Inclusion Lead.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school's Behaviour Policy, but this Child Protection and Safeguarding policy will apply to any allegations that raise safeguarding concerns.

This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves non-consensual sexual activity, including but not limited to sexual exploitation or sexual abuse, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting, making and sharing of nudes and semi-nudes).

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

- Members of staff must tell the DSL and record the allegation, but not investigate it
- The DSL will contact the local authority children's social care team and follow its advice as well as the police if the allegation involves a potential criminal offence
- The DSL will put a *risk assessment* and *support plan* into place for all children involved – both the victim(s) and the child(ren) against whom the allegation has been made – 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 instigator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

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

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

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between children, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 20 below)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
    - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
    - 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"
    - 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:
        - Children can show signs or act in ways they hope adults will notice and react to
        - A friend may make a report
        - A member of staff may overhear a conversation
        - A child's behaviour might indicate that something is wrong
    - That certain children may face additional barriers to telling someone because of their age, vulnerability, disability, gender, ethnicity and/or sexual orientation
    - 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

- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- 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.

The DSL/Head Teacher will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

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 does not (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, taking into account whether:

- Taking action 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
- 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.

19. Sharing of Nudes and Semi-Nudes (sexting / 'youth produced sexual imagery')

If staff are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, they must report it to a DSL *immediately*.
This includes images or videos that are:

- Digitally altered using technology e.g. a child's face superimposed onto someone else's body
- Wholly generated by artificial intelligence (AI)
- Taken, created or shared without consent
- Taken and shared consensually but later shared more widely without consent

All incidents of making or sharing of nudes or semi-nudes mandate a safeguarding response, regardless of whether the images were created or shared consensually.

Staff must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it

- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

Staff must report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

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

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

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

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

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

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

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

Informing parents/carers

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

Referring to the police

If it is necessary, the incident may be referred to the police by dialling 101.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded promptly.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our RSHE curriculum and Online Safety curriculum.
Teaching covers the following in relation to the sharing of nudes and seminudes:

- What it is
- How it is most likely to be encountered
- 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
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

As part of their learning, pupils will be made aware of the processes the school will follow in the event of an incident. Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people

- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

20. Reporting Systems for our Pupils

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.
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:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- Check with pupils that they are comfortable speaking with the member of staff.

We do this through the means of:

- Having posters identifying the DSLs and their role in all classrooms and other appropriate places around the school.
- Class lessons, year group and key stage assemblies
- Promoting other means of reporting e.g. Childline, the NSPCC and CEOP
- Including reporting where appropriate in safeguarding learning activities/assemblies.

To ensure impact we will:

- Include questions about reporting in pupil safeguarding surveys and pupil voice activities.

21.Online Abuse and Cybercrime

We have an **Online Safety Policy** which is reviewed and updated annually in line with this policy and KCSIE. Within this, we recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- Review annually the effectiveness of filtering and monitoring systems (HT, DSL supported by the IT managed service provider).

- Record the review findings and any actions taken
- 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')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- Content – being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism, misinformation and disinformation (including fake news and images) and conspiracy theories. Harmful content can be human created or AI-generated content.
- Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes. Contact risks may also arise through interactions with generative AI systems, chatbots and virtual assistants which simulate human communication.
- 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; and
- Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above, we will:

Educate pupils about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- 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

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.
- All staff will also receive cyber safety training annually.

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:

- 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
- Staff will not take pictures or recordings of pupils on their personal phones or cameras

Educate parents/carers about online safety via:

- our website
- communications sent directly to them
- during parents' evenings, workshops or by directing to expert resources.

We will also share clear procedures with them so they know how to raise concerns about online safety.

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

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

Pupil Mobile Phones

We recognise that mobile phones are now widespread among children and that they can present both opportunities and risks to children's safety and wellbeing.

Our approach:

Unicorn Primary School operates as a **mobile phone-free environment** during the school day. This means that pupils do not have access to their mobile phones during lessons, breaktimes, and lunchtimes.

- Y5 and Y6 pupils may bring mobile phones to school of they are travelling to and from school alone
- Mobile phones are stored in VE/CB's or the school office during the school day
- Children must turn off phones on entering the school site
- Exceptions will be made for pupils with specific needs (e.g., medical conditions)

Staff responsibilities:

All staff are responsible for:

- Enforcing the mobile phone procedure consistently
- Challenging pupils who are seen using mobile phones during the school day
- Reporting any concerns about mobile phone use to the DSL, particularly where there are safeguarding concerns

- Modelling appropriate mobile phone use

Searching and confiscation
The DSL or DDSL has the power to search pupils' phones where there is reasonable suspicion that the phone contains evidence of harmful or inappropriate content, or where a pupil has breached the mobile phone procedure. This will be done in line with DfE guidance on searching, screening and confiscation, and our school's behaviour policy.

Any searches will:
- Be conducted by a member of staff authorised by the Head Teacher
- Have a second member of staff present as a witness
- Be recorded and parents/carers informed

Artificial Intelligence (AI)

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

Unicorn Primary School recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI also has the potential to facilitate many forms of abuse 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.
Unicorn will treat any use of AI to access harmful content, to bully or abuse pupils, in line with this policy and our anti-bullying and behaviour policies.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school. In line with the trust's 'Responsible use of AI' policy.

Unicorn Primary School works with LGFL and Eduthing (IT Managed Service Provider) to meet the expectations outlined in the government guidance on generative artificial intelligence (AI) products and systems and their use in educational settings.

22.Notifying Parents

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL/ DDSL will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents about any such concerns following consultation with a DSL.

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

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

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

- Meet with the victim's parents or carers, with the victim, to discuss what is being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged instigator'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)

23. Complaints and Concerns about School Safeguarding Practices

Complaints against staff

Complaints against staff (including temporary, trainee, supply, coaches or peripatetic teachers) 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 3).

Whistle-blowing

The Trust has a Whistle Blowing Policy which staff should refer to should they feel that our Safeguarding Policy is unsafe or failing pupils. (Trust Whistleblowing Policy)

Record-keeping

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded, either in writing, or on CPOMs. This should include instances where referrals **were or were not** made to another agency such as local authority children's social care or the Prevent programme, etc. If a member of staff is in any doubt about whether to record something, discuss it with the DSL. Paper records will be securely stored.

Non-confidential records will be easily 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.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school and in accordance with the Trust's Data Retention Policy.

Information will be sent securely to schools on transition which will have been checked by two adults prior to sending and a receipt will be obtained via a secure online portal (for example, egress). If a child/children leave the borough or country and there are no details of a receiving school, Bromley Admissions Team and the designated EWO will be informed.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file. To allow the new school/college to have support in place as soon as possible after the child arrives, this should be within:

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term

The files will include:

- A summary of current safeguarding concerns – usually via CPOMS chronology
- Relevant context
- Ongoing support needs, including any designated by safeguarding partners
- Clear distinction between current and historic information via the CPOMS chronology

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.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
- Appendix 3 contains our policy on record-keeping with respect to allegations of abuse made against staff

24.Training

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.
Annually, this training will be updated and will be in line with advice from our local safeguarding children's board and the updated version of Keeping Children Safe in Education (KCSIE) and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- Include training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism and to challenge extremist ideas.
- Include training on FGM and responsibilities specific to roles.
- Have regard to the Teachers' Standards to support the expectation that all teachers:
    - Manage behaviour effectively to ensure a good and safe environment
    - Have a clear understanding of the needs of all pupils.

Staff will also receive safeguarding and child protection updates through e-mail updates and staff meetings as required.

Volunteers and work experience students will receive appropriate training, if applicable.

The Designated Safeguarding Leads and Deputies

The DSLs, including deputies, will undertake child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

Governors

All governors and trustees will receive appropriate safeguarding and child protection (including online) training at induction, which is regularly updated, to equip them with the knowledge to provide strategic challenge and understand their responsibilities.

Governors will be made aware of staff training events and will have the option to attend.

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

Recruitment – interview/appointment panels

At least one person on any interview/appointment panel for a post at the school will have undertaken specific **safer recruitment** training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and be in line with local safeguarding procedures.

For agency and third-party supply staff and trainee teachers, written confirmation to show the dated relevant checks, appropriate certificates and the enhanced DBS clearance have been secured by the agency is always sent to the school in respect to the member of staff prior to them arriving to work at Unicorn.

25.Monitoring Arrangements

This policy will be reviewed **annually** by the Head Teacher. At every review, it will be approved by the full governing board.

26.Links with other policies

This policy links to the following policies and procedures:

- Behaviour and Relationships
- Complaints
- Health and Safety
- Attendance
- Online Safety
- Children with Medical Needs
- RSE (Relationships and Sex Education)
- Educational Visits
- Mosaic: Staff Code of Conduct
- Mosaic: Responsible use of AI
- Mosaic: Whistle-Blowing
- Mosaic: Recruitment and Selection Policy and Procedures
- Mosaic: The Equal Opportunities Policy
- Mosaic: Disciplinary and Grievance Procedures
- Mosaic: Data Protection Policy
- Mosaic: Critical Incident Management Policy

Appendices

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education (2026)

They are not, however, exhaustive and staff should make themselves aware of the information contained on the Bromley Safeguarding Children Board website which is regularly updated and links to other very useful safeguarding sites.

http://www.bromleysafeguarding.org/

Appendix 1: 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 cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse involves forcing, causing 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 or not. 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.

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

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate 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.

Contextual Safeguarding

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. We recognise that parents and carers may have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships. Contextual Safeguarding recognises that young people are vulnerable to abuse in a range of social contexts.

If there are any concerns staff and parents should share with the DSL immediately.

Appendix 2: 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 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

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

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

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

Seeking references and checking employment history

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

When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the head teacher/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.

We will record all information on the checks carried out in the school's single central record (SCR). We follow requirements and best practice in obtaining these checks, as set out below.

Appointing 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 Disclosure and Barring Service (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 this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available, including using the DfE's 'Check a Teacher's Record' to make prohibition, direction, restriction, and 'children's barred list' checks, where appropriate.
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher and will undertake a prohibition check for all staff,
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK.
  These could include, where available:
- For all staff, including teaching positions, criminal records checks for overseas applicants
- For teaching positions, obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- 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
- Ask for written information about previous employment history and check that information is not contradictory or incomplete.

We will seek references on all shortlisted candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. Shortlisted candidates should be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children.

In addition, as part of the shortlisting process, we will carry out an online search as part of our due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which we might want to explore with the applicant at interview. We will advise shortlisted candidates that online searches may be done as part of our due diligence checks.

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place and any advice sought.

Regulated activity means a person who will be:

- Responsible, on a **regular** basis (once a week or more often, or on more than 3 days in a 30-day period) in a school or college, for teaching, training, instructing, caring for or supervising children
- Carrying out paid or volunteer work **regularly** in a school or college where that work provides an opportunity for contact with children
- 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

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

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
- If 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.

Confirmation from the agency that the supply/agency staff, coaches or peripatetic teachers have completed Safeguarding training from their agencies will be obtained. This should always include KCSIE Part 1. Adults described above should be made aware of where they can access the school's Child Protection and Safeguarding Policy, Behaviour Policy and the Staff Code of Conduct; and who the DSLs are.

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 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. Where the contractor does not have opportunity for regular contact with children, the school will decide on whether a basic DBS check would be appropriate. We will either obtain the DBS check directly or request to see their DBS certificate to ensure the check is at the level required.

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.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

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.

In both cases, this includes checks to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 and Childcare Act 2006.

Volunteers

We will:

- *Never* leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity or will be assisting in an activity where they may be alone with children e.g. supervising changing for swimming. (Any volunteer who teaches, trains, instructs or supervises children frequently – more than three days in a 30-day period – is classed as in regulated activity and requires an enhanced DBS check with barred list information.)
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Governors 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.

The chair of the board will have their DBS check countersigned by the secretary of state.

All trustees, local governors and Members will have the following checks:

- Identity
- Right to work in the UK
- Other checks if, in the last 5 years, they have lived, travelled or worked abroad for more than three months

- A section 128 directive if they have any financial responsibility

Staff working in alternative provision settings
Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform, and that the setting has appropriate, updated and reviewed policies in place for Safeguarding and Child Protection.

Where a school places a pupil in an alternative provision provider, Unicorn Primary School continues to be responsible for the safeguarding of that pupil, and should be satisfied that the placement meets the pupil's needs.

The APs safeguarding policies and procedures will continue to be reviewed on a regular basis and regular communication will take place between them and UPS – for example with our Inclusion Lead, CB.

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.
DBS Checking: Where students **over the age of 16** undertake work experience in school, they will be subject to an enhanced DBS check as a volunteer at the school or a letter of assurance from the work experience candidate's education setting and a risk assessment. They *cannot* undertake work experience without this.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unfounded, unsubstantiated or malicious. We will not refer to any repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious.

We will refer to substantiated allegations in references, provided that the information is factual and does not include opinions.

Record Keeping

Unicorn Primary School will apply the Information Commissioner Employment Practices Code published guidance on employment records and record retention.

Appendix 3: Allegations of Abuse Made Against Staff including Low-Level Concerns

Section 1: allegations that may meet the harm threshold

This section is based on 'Section 1: Allegations that may meet the harm threshold' in part 4 of Keeping Children Safe in Education.
This section 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 we are in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO). This person is Gemma Taylor.

We will deal with any allegation of abuse quickly, aiming for within 24 hours from receiving the concern, 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 head teacher, or in their absence a nominated deputy, or the chair of governors where the head teacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

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

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned.

- Providing an assistant to be present when the individual has contact with children.
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children.
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted.
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the Mosaic Learning Trust

If in doubt, the case manager will seek views from the Mosaic's Head of HR and the LADO, as well as the police and Bromley Children's Safeguarding Team and the LA employing the individual if they are employed under another Local Authority, 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 that supports the allegation being made.

Procedure for dealing with allegations

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or local authority 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 local authority children's social care services, where necessary). Where the police and/or local authority 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 local authority 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 local authority children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the LADO and the Mosaic's Head of HR. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the LADO 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 LADO to initiate the appropriate action in school and/or liaise with the police and/or Bromley Children's Safeguarding Team as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep the individual informed of the progress of the case and considering what other support is appropriate. The individual will be signposted to all available support, as appropriate, for example Trade Union representation and any arrangement for emotional, medical and/or financial support
- 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 the LADO and / or Bromley Children's Safeguarding Team 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 the individual (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of the individual 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 individual)

- 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

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If Unicorn Primary 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, trainee 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, trainee 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 head teacher or chair of governors or deputy if assigned, will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

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

Timescales

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

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

- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

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

Specific actions

Action following a criminal investigation or prosecution
The case manager will discuss with the LADO whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or local authority 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 local authority 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 local authority 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 local authority 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 local authority children's social care or the police as appropriate.
We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations that 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 LADO 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 or LA Safeguarding Officer in line with our local authority's procedures for dealing with non-recent allegations.

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

Section 2: Concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, supply support staff, peripatetic teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.
Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

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

Definition of low-level concerns

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

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

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door, without a window*
- Humiliating pupils

**Where children have specific needs and require additional support, such as therapy in the sensory room, this will be recorded on their SEND documentation, e.g. Pupil Passports or Risk Assessments. If a child requires intimate care support, there will always be two members of staff present.*

Sharing low-level concerns

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system
- Providing scenarios in training sessions to help embed the culture

Responding to low-level concerns

If the concern is raised via a third party, the head teacher 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 head teacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the MOSAIC Schools Learning Trust Staff Code of Conduct. The head teacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

- All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding provision and know that such concerns will be taken seriously by the senior leadership team.
- School's will follow the LA LADO procedures and report relevant matters via the portal or secure email

All concerns will be investigated and all parties informed of the procedures and findings.

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

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

References

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

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

Appendix 4: Specific Safeguarding Issues

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will call the police and all named contacts, and members of staff will search the area around the school.

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
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school. (Elective home education can mean that some children are not in receipt of suitable education, although many home educated children have a positive learning experience).
- 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, neglect and exploitation, 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 missing, such as travelling to conflict zones, FGM and forced marriage.

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

Non-collection of children

If a child is not collected at the end of the school day, they will be taken to main reception. We will call around all contacts in the first instance. A reasonable explanation and time given for collection will mean that the child then goes to our wraparound care club until the stated collection time.
If no contact can be made and the child is not collected by 4:30pm, we will advise contacts that social services will be contacted.

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. It may involve an 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
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education
- Going missing from school or home and are subsequently found in areas away from their home area
- Having been the perpetrator or alleged perpetrator of serious violence (e.g., knife crime), as well as the victim

If a member of staff suspects CCE, they will discuss this with the DSL. 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 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. As with CCE, it may involve an 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 older boyfriends or girlfriends
- Suffering from sexually transmitted infections or becoming pregnant
- Displaying inappropriate sexualised behaviour

If a member of staff suspects CSE, they will discuss this with the DSL. 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.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that, even if there are there no reports, that does not mean that this kind of abuse is not 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)

- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Up skirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could 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 do not want to receive such content.

When staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out previously in this policy, as appropriate.

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

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents.

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 witnessing the ill treatment of others.

Children who witness domestic abuse, either in the family setting or outside the immediate family, are also victims as this can have a lasting effect on children. They may see, hear or experience the effects in their own home or in their own intimate relationships (teenage relationship abuse) in which they may be victims or instigators of abuse. This can have a long-term impact on the child's health, well-being and development and their ability to learn.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL and deputy/deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where children are placed on Temporary **Accommodation Notification Duty,** the DSL/DDSL will contact the Local Housing Authority to raise concerns at the earliest opportunity, and be vigilant of additional safeguarding concerns. As a school we will work with the appropriate agencies and the family to support learning.

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

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 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 are stated earlier in this policy.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out

- A family/pupil already being known to social services in relation to other safeguarding issues

A girl may be:

- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- 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)
- FGM being known to be practised in the girl or family's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school

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

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

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
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk

Preventing radicalisation

Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence.
Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

- Negate or destroy the fundamental rights and freedoms of others; or
- Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights, or
- Intentionally create a permissive environment for others to achieve the results outlined in either of the above points

Terrorism is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property, or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism may 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 becoming involved with or supporting terrorism. 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.
Staff will have an awareness of the DfE guidance:
https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation/managing-risk-of-radicalisation-in-your-education-setting

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 children board and local police force.

We will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at school and at home.

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

Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online.

- Possessing extremist literature
- 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.

If staff are concerned about a pupil, they will follow our procedures set out in this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including online safety.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- 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, in all likelihood, 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

- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- 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.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and gender questioning (LGBT) children are at greater risk. Children with disabilities are 3 times more likely to be abused than their peers.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up 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 follow the procedures set out previously in this policy.

Supporting Children Questioning Their Gender

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and gender questioning (LGBT) children are at greater risk. Children with disabilities are 3 times more likely to be abused than their peers

We recognise that some children may go through a period of questioning their gender. For the majority of young children, this will not continue into adulthood. We are committed to supporting all children in our care while maintaining our safeguarding responsibilities to all pupils.

When supporting children who are questioning their gender, we will:

- Take time to understand the thoughts and feelings of the child and be appropriately professionally curious

- Be aware of the potential vulnerabilities of these children, including the possibility of complex mental health and psychosocial needs (for example, relating to relationships with family and peers)
- Take a strong, proactive stand against all forms of bullying, including bullying related to gender identity
- Not allow children into toilets, changing rooms, and boarding/residential accommodation designated for the opposite biological sex. No exceptions are permitted, even when supporting a child's social transition.
- We recognise we are able to separate children according to their biological sex when playing certain competitive sports without discriminating unlawfully. Some sports may need to be played in single-sex groups to ensure children's safety, and where this is the case, there must be no exceptions.

Parental involvement

We will actively involve parents/care givers where a child who is questioning their gender asks for support, unless there are exceptional circumstances where doing this would constitute a greater risk to harm the child than not involving them. In such rare cases, we will seek advice from children's social care and document our decision-making carefully.

Social transition

We take a very careful approach in relation to accommodating social transition, particularly in our primary school setting.

Staff must not adopt any changes relating to social transition unless a decision has been made by the school and the child's parents/care givers have been involved.

This includes changes to:

- Names and pronouns used
- Uniform or dress code
- Use of facilities (toilets, changing rooms)
- Participation in activities

Where a child or their parent/carer raises a request relating to social transition to which our school is responding, we will:

- Consider how pupils would be best supported
- Ensure we document our decision-making process and keep detailed records
- Comply with our distinct but interacting obligations under safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by our evaluation of the welfare and best interests of the child and other children
- Consider whether full social transition is appropriate, bearing in mind that support for full social transition in primary schools should be agreed very rarely
- Regularly review any decisions made, recognising that a child's needs may change over time

Safeguarding considerations
When considering requests for support, we will assess:

- The child's age and developmental stage
- The child's understanding of their request
- Any mental health or wellbeing concerns
- Family circumstances and parental views
- The impact on the child and other children in the school
- Whether there are any safeguarding concerns that need to be addressed

We will seek advice from relevant professionals, which may include educational psychologists, mental health services, and children's social care where appropriate.

Recording information
We must record a child's biological sex accurately wherever it is recorded in school systems and documentation. This is a legal requirement.

Mental Health or Wellbeing concern

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. All 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.

Examples of mental health problems that may develop into safeguarding concerns include:

- Self-harm
- Suicidal ideation (thoughts about suicide)
- Risk of suicide
- Eating disorders
- Depression and anxiety
- Post-traumatic stress disorder (PTSD)

Warning signs that staff should recognise

Staff are well placed to recognise potential warning signs that a child may be experiencing mental health difficulties, including:

- **Significant changes in behaviour** – becoming withdrawn, aggressive, or displaying unusual behaviour
- **Difficulty sleeping** – tiredness, difficulty concentrating, reports of nightmares
- **Physical signs of self-harm** – unexplained cuts, bruises, or burns, particularly on wrists, arms, thighs, or chest; wearing long sleeves in warm weather

- **Changes in eating patterns** – significant weight loss or gain, skipping meals, obsessive behaviour around food
- **Difficulty concentrating** – not doing as well at school, struggling to focus
- **Mood changes** – becoming more irritable, angry, tearful, or displaying extreme mood swings
- **Social withdrawal** – isolating themselves from friends and family, not wanting to participate in activities they previously enjoyed
- **Expressing feelings of worthlessness or hopelessness** – negative self-talk, expressing that they don't want to be alive
- **Risk-taking behaviour** – such as substance misuse, running away, or engaging in dangerous activities
- **Talking about death or suicide** – either directly or indirectly (e.g., "I wish I wasn't here," "Everyone would be better off without me")

Information about actions staff should take and support is given earlier in this policy.

Concerns about Serious Violence

Serious violence is a safeguarding concern. All staff should be aware of the indicators that a child may be at risk from, or involved with, serious violent crime.

What is serious violence?
Serious violence includes:
- Physical assault causing serious harm
- Carrying, threatening with, or using weapons (including knives, firearms, or other offensive weapons)
- Gang-related violence
- Violence linked to county lines and drug dealing

Indicators that a child may be at risk
Indicators which may signal that a child is at risk from, or involved with, serious violent crime include:
- Increased absence from school or disengaged from education
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance or behaviour
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries (particularly defensive injuries)
- 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)
- Carrying or talking about weapons
- Expressing intent to harm others or themselves
- Showing signs of trauma or distress

Risk factors
Risk factors which increase the likelihood of involvement in serious violence include:
- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery
- Having disrupted education (e.g., suspensions, permanent exclusions, or time in alternative provision)
- Having a history of offending

Timing of risk
Staff should stay alert to when children might be at highest risk of serious violence. This includes:
- **Straight after school** – when children are travelling home or gathering in public spaces
- Times of transition
- During periods of exclusion or absence from school

What staff should do

If a child is carrying or using a weapon, or expressing intent to do so, staff must:
1. Report this to the DSL or DDSL immediately
2. Not put themselves or others at risk: do not attempt to confiscate a weapon if this would be dangerous
3. **Call 999 if there is immediate danger**

The HT/DSL or DDSL will:
- Assess the risk and decide on the appropriate response
- **Contact the police** where appropriate, particularly if there is an immediate risk or a weapon is involved

- Make a referral to children's social care if there are safeguarding concerns
- Work with the child and family to access support
- Consider early, evidence-based support for children at risk, such as:
    - Targeted mentoring programmes
    - Therapeutic support
    - Engagement with youth services
    - Referral to violence reduction programmes

Early intervention
We recognise the importance of early, evidence-based support for children considered at risk of serious violence. The DSL will work with relevant agencies to ensure children receive appropriate support as early as possible.

Information sharing
Where there are concerns about a child carrying or using a weapon (or expressing intent to do so), the DSL will share this information with relevant agencies and with any new school if the child transfers. This is to ensure that appropriate risk assessments and support plans are in place.

Prohibited Items

The school complies with the DfE Searching, Screening and Confiscation Guidance 2022: The Head Teacher or staff authorised by them can make the decision to search pupils or their possessions, without consent, if they have reasonable grounds for suspecting prohibited items, such as:

- Knives or weapons
- Alcohol
- Illegal or controlled drugs
- Stolen items
- Tobacco and cigarette papers or vape items
- Fireworks
- Pornographic materials
- Any article that staff reasonably suspect has been, or is likely to:
    - Cause personal injury
    - Damage to property or persons
    - Any items banned by the school and identified in the school rules

Procedures are clearly detailed in our Behaviour and Relationships Policy.

New Migrant Families

Additional processes have been put in place by the local authority to smooth the transition into school of children from migrant families entering the UK, in the light of the Ukrainian crisis. The DSL will work with the local authority when the children start school and will work with the parents and an interpreter to obtain background information.

We will be aware that the child may have witnessed traumatic events, and may be separated from members of the family who remain in the Ukraine.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

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

identification. Visitors are expected to sign in and wear a visitor's badge. Staff are expected to challenge anyone they see on site without a visitor badge visible.

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 to our setting, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff. Content of presentations will be discussed with the visitor to ensure it is appropriate.

Appendix 5: Safeguarding Considerations for Remote Education

On-line safety

All schools are now using more online resources, and the resources used must all comply with the Trust GDPR requirements. As part of the online planning process, we must ensure children who are being asked to work online have very clear reporting routes in place so they can raise any concerns whilst online. Staff must be aware that some children are more at risk of harm, and that this applies also to online harm. As well as reporting routes back to the school this should also signpost children to age-appropriate practical support from the likes of:

- Childline - for support
- UK Safer Internet Centre - to report and remove harmful online content
- CEOP - for advice on making a report about online abuse

We are in regular contact with parents and carers, for example, through weekly newsletters and also through the home learning being set each week. We should use our lines of communication to reinforce the importance of children being safe online. It will be especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will asked to access, and be clear who from the school their child is going to be interacting with online.

Parents and carers may well be looking for other support from the many companies offering tuition. Schools must advise parents of the need to use reputable providers who can evidence their online safety and credentials for having access to children. Schools should signpost parents and carers to the following support:

- Internet matters - for support for parents and carers to keep their children safe online
- London Grid for Learning - for support for parents and carers to keep their children safe online
- Net-aware - for support for parents and careers from the NSPCC
- Parent info - for support for parents and carers to keep their children safe online
- Thinkuknow - for advice from the National Crime Agency to stay safe online
- UK Safer Internet Centre - advice for parents and carers

Appendix 6: Children Adopted from Care

Adoption is a very sensitive issue and Unicorn Primary School has a process to ensure that the child's move, either into or away from Unicorn, is dealt with carefully and with a view to ensure that we do not jeopardise the child or the adoption placement. That a child is in care or adopted should be on a need-to-know basis. The member of staff with responsibility for looked after children is the Assistant Head Teacher and this is overseen by the Head Teacher.

The Adoption Process

A child may arrive at school living with their pre-adoptive parents. At this stage, they are still a Child Looked After with parental responsibility shared between the LA and the pre-adoptive parents. The adoption will usually take place some months later at which point the parental responsibility moves to the adoptive parents.
When the child joins the school, the pre-adoptive parents may wish the child to be known by their surname, as it will change to this after the adoption. At this stage, the child must be registered with the legal surname and the pre-adoptive family surname as preferred.

Creating a MIS Record

Although it is likely that a CTF will be available from the previous school, there will be situations in which this is not the case to ensure that the child cannot be traced. If Unicorn is the "previous" school, then the designated teacher should liaise with the social worker to determine whether a CTF can be generated with the new school as the destination. If not, the CTF can be generated with LLLL coding and the new school can collect from S2S.

If Unicorn is the receiving school, the previous school SHOULD NOT be contacted until the designated teacher has spoken to the social worker.

The paper file should move to the new school via the social worker and the Virtual School who will go through the file to remove any information around the child's previous identity or which might be detrimental to the placement with the adoptive parents. This should also happen if a child is remaining at the same school.

UPN

The DfE guidance https://www.gov.uk/government/publications/unique-pupil-numbers clearly states the need for a new UPN to be issued. The previous UPN should be deleted, and NOT recorded under previous UPN. (There are some very limited situations in which the previous UPN information may be retained, but this is only with the permission of the adoptive parents and the LA adoption service, and a new UPN will still have to be generated). The issue of a new UPN will mean that historic assessment and other educational data will be lost and have to be re-entered to the MIS against the new identity. As a minimum, this should be end of Key Stage results and summary attendance data for at least an academic year.

In the case of a child in school being adopted and staying at Unicorn, the following is a step-by-step guide to dealing with the situation, which will involve creating a brand new student, making the existing student a Leaver and erasing any links between these two students.

Creating a new student

- Create a new student on the system in the child's new identity
- Enter the relevant class and use the date of adoption as the admission date
- Issue the student with a new UPN
- Ensure that the child's record shows the new address
- Check that the adoptive parents' details are copied onto the new record, then break the link with the existing student
- Enter all relevant data relating to dietary, medical, ethnic/cultural and first language (provided by adoptive parents)
- There should be no previous school history or attendance history prior to the adoptive date – student must be treated as a completely new child.
- Enter assessment data as applicable or download from Key to Success

Amending the original student

- Search for the original existing student and open their record
- The legal & preferred surname and forename must both read the pre-adopted legal names
- Delete the student's photograph
- All registration details stay with the student's record (including UPN)
- Delete the current home address
- Enter the school address as the student's current address and set the address type as 'home' – This is to ensure that this record will not fail when you submit the next census return
- Highlight and delete all telephone numbers and email addresses
- Highlight and delete the adoptive parents in 'contacts'
- Enter the date of leaving and the reason for Leaving as 'Unknown'. In most circumstances the date of leaving will be before the date of adoption.
- 'Destination After Leaving' field is to be left blank
- It is important you check if there are any linked documents containing any reference to the new student or his/her new adopted parents. If so, they will need to be deleted.

Pupil Premium

Whilst the child is in care, the school will receive Pupil Premium LAC, but once adopted the child will no longer be in the care of the LA. The child can be entitled to receive Pupil Premium

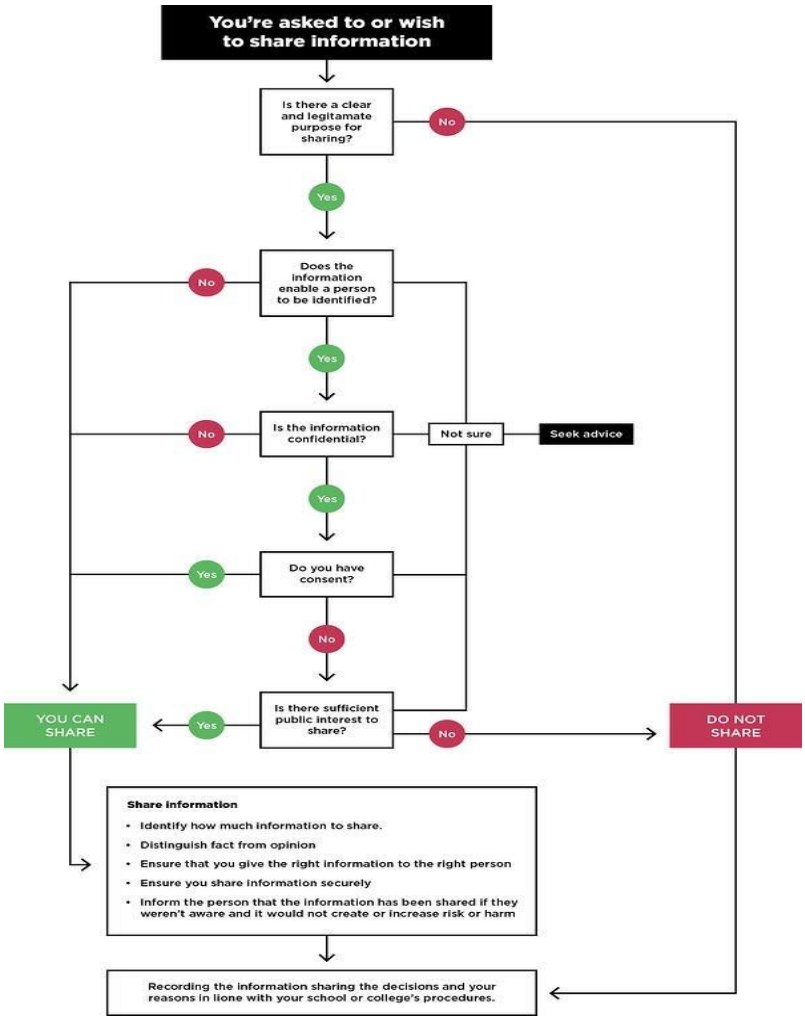
(PP+) as a child who has been adopted from care, but the school will need the express permission of the adoptive parents on order to be able to claim this.

Appendix 7 - Information Sharing in Schools: The Seven Golden Rules to Follow

To keep children and young people safe in schools and colleges, you need to share information appropriately so the correct decisions can be made to protect them. This is why the government has outlined the seven golden rules for information sharing as safeguarding involves sensitive information which directly affects the welfare of children and young people.

However, clear boundaries around information sharing or disclosures are important to maintain confidentiality where appropriate. Underneath the seven golden rules for information sharing below, you will also find a useful flowchart of key questions.

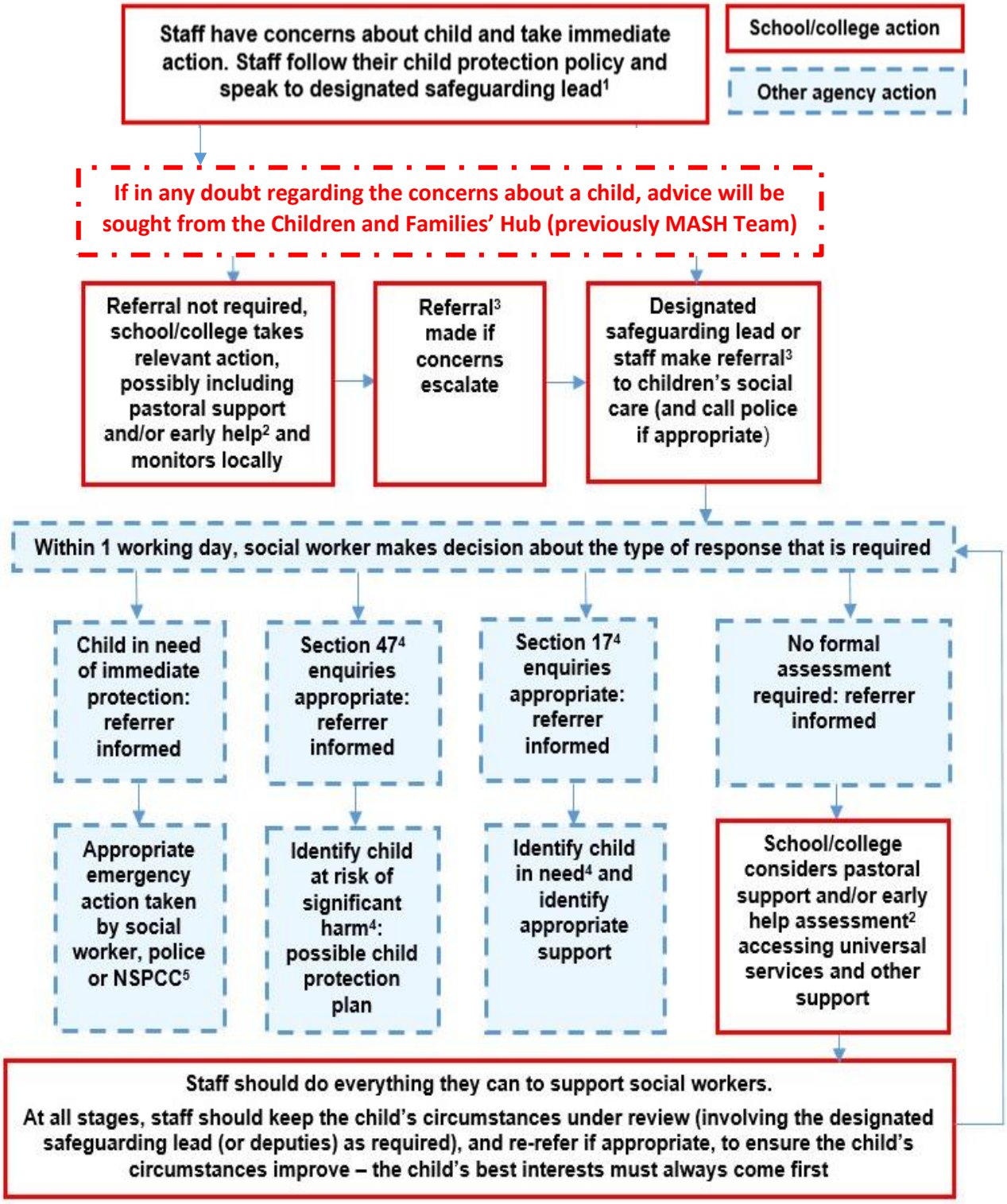
1. GDPR is not a barrier to sharing information
2. Be open and honest
3. Seek advice
4. Share with consent where appropriate
5. Consider safety and wellbeing
6. Necessary, proportionate, relevant, accurate, timely and secure
7. Keep a record



https://blog.insidegovernment.co.uk/schools/information-sharing-the-seven-golden-rules-to-follow#:~:text=Necessary%2C%20Proportionate%2C%20Relevant%2C%20Adequate,fashion%20and%20also%20shared%20securel

Appendix 8: Flowchart of Actions where there are Concerns about a Child

(quick reference – adapted from the KCSIE guidance)



[1] In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.
[2] Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. See Working Together to Safeguard Children for further guidance
[3] Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.
[4] Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of Working Together to Safeguard Children.
[5] This could include applying for an Emergency Protection Order (EPO).

Appendix 9 - Filtering Standard for Mosaic Schools

Schools within MSLT have a managed broadband service with one of two providers.

- LGfL provide a filtering system called Senso
- EIS provide a filtering system called Smoothwall.

For both systems Eduthing IT Consultants have access for the purposes of configuring settings, monitoring for issues, tweaking the filtering, and contacting providers for any support required.

How Filtering Systems Work

Filtering systems have categories that are either allowed or blocked for groups of users. In addition to this, each school has its own list of exceptions. Websites that are allowed or denied.

All these settings are put into a policy and assigned users or devices. At the MSLT schools there are staff policies which are applied to Windows staff logins computers and staff mobile devices and there are student policies which are applied to Windows student logins and student devices.

Guest wi-fi networks intentionally deny users access to the school network but still provide a filtered connection to the internet via a specific policy.

Monitoring of Systems

Eduthing IT Consultants access the filtering systems to check filtering policies and ensure that:

- They are applying to the correct users and devices on the school network.
- The correct categories are allowed or denied.
- The school's custom lists are updated according to need.

Scheduled reports can be run that will send data to relevant staff. SWGfL's testing tool can be run to check that the filtering system is operational.

Both providers have confirmed that

- They are members of the Internet Watch Foundation
- They implement the CTIRU block list which cannot be bypassed.
- Techniques and technologies to bypass filtering is also blocked.

Desktop monitoring systems can be expensive to purchase and run and they are only supported on Windows computers. Schools should risk assess if they require monitoring software, or if they can adequately monitor devices using staff observation. It should be noted, however, that monitoring software will run on desktop computers and laptops but not mobile devices such as iPads.

The schools filtering and monitoring provision is reviewed annually by Eduthing IT Consultants as part of a suite of Cyber Security checks undertaken to ensure the security in integrity of the school network. While Eduthing provides technical support and annual cyber security checks, the school leadership team is responsible for the strategic review of effectiveness.

Reporting Concerns

Staff should notify an Eduthing Consultant if: unsuitable material has been accessed, if they are teaching topics which could create unusual activity on the filtering logs, there is failure in the software or abuse of the system or if they notice abbreviations or misspellings that allow access to restricted material.

Filtering systems will identify the device name, date, time, and search criteria of an incident.

If a website needs to be blocked or if there are concerns that the filtering system is not operating correctly, staff should immediately log a ticket with the IT consultant who will investigate.

Appendix 10
Additional Advice and support

Abuse or safeguarding Issue	Link to Guidance/Advice	Source
Abuse	What to do if you're worried a child is being abused https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf	DfE Advice
	Domestic Abuse: Various Information/Guidance https://www.gov.uk/guidance/domestic-abuse-how-to-get-help#history	Home Office
	Faith Based Abuse: National Action Plan https://www.gov.uk/government/publications/nationalactionplan-to-tackle-child-abuse-linked-to-faith-or-belief	DfE Advice
	Relationship Abuse: disrespect nobody https://www.disrespectnobody.co.uk/relationshipabuse/whatis-relationship-abuse/	Home Office Website
	OE Teachers' National helpline https://www.operationencompass.org/ 02045 5139990	DfE Advice
Bullying	Preventing bullying including cyberbullying https://www.gov.uk/government/publications/preventingandtackling-bullying https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/374850/Cyberbullying_Advice_for_head teachers_and_School_Staff_121114.pdf https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/444865/Advice_for_parents_on_cyberbullying.pdf https://www.gov.uk/government/publications/review-of-sexual-abuse-in-schools-and-colleges/review-of-sexual-abuse-in-schools-and-colleges (see linked documents)	DfE Advice
Children and the courts	Advice for 5 – 11 year old witnesses in criminal courts https://www.gov.uk/government/publications/youngwitnessbooklet-for-5-to-11-year-olds	MoJ Advice

Children missing from education, home or care	Children missing education https://www.gov.uk/government/publications/childrenmissingeducation https://media.inzu.net/f0e9b37b8c44e338f64ae38c6d41e267/mysite/articles/602/Bromley_Children_Missing_Education_Policy_and_Procedure_June_2017.pdf	DfE Statutory Guidance
	Children missing from home or care https://www.gov.uk/government/publications/childrenwhorun-away-or-go-missing-from-home-or-care https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/271820/Flowchart_when_a_child_goes_missing_from_care.pdf	DfE Statutory Guidance
	Children and adults missing strategy https://www.gov.uk/government/publications/missingchildren and-adults-strategy https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/117793/missing-persons-strategy.pdf	Home Office Strategy
Children with Family Members in Prison	National Information Centre on Children of Offenders https://www.nicco.org.uk/	Barnardo's in partnership with Her Majesty's Prison and Probation Service advice
Children with Family members in the court system	CAFCASS Cafcass, 16th Floor, Southern House, Wellesley Grove, Croydon, CR0 1XG Website: www.cafcass.gov.uk Call Centre: 0300 456 4000	Bromley Safeguarding Partnership
Child Exploitation	County Lines: Criminal exploitation of children and vulnerable adults https://www.gov.uk/government/publications/criminalexploitatio n-of-children-and-vulnerable-adults-county-lines	Home Office Guidance
	Child Sexual Exploitation: guide for practitioners https://www.gov.uk/government/publications/childsexualexploitation-definition-and-guide-for-practitioners https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/591905/CSE_Guidance_Annexes_13.02.2017.pdf	DfE

	Trafficking: Safeguarding Children https://www.gov.uk/government/publications/safeguardingchildr en-who-may-have-been-trafficked-practice-guidance https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/942454/Working_together_to_safeguard_children_inter_agency_guidance.pdf https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims	DfE and HO Guidance
Drugs	Drugs: Advice for Schools https://www.gov.uk/government/publications/drugs-adviceforschools	DfE and ACPO advice
	Drugs Strategy 2017 https://www.gov.uk/government/publications/drugstrategy-2017	Home Office Strategy
	Information and Advice on Drugs https://www.talktofrank.com/	Talk to Frank Website
	Drug Strategy 2017 https://www.gov.uk/government/publications/drugstrategy-2017	Home Office Strategy
	Information and Advice on Drugs https://www.talktofrank.com/	Talk to Frank Website
	ADEPIS Platform sharing information and resources for schools covering drug (and alcohol) prevention http://mentor-adepis.org/ Bromley Changes (Young people's Drug and Alcohol Services) 0208 289 1999 referrals.bromley@cgl.org.uk	Website developed by Mentor UK
"Honour – Based" Abuse	Female Genital Mutilation: Information and Resources https://www.gov.uk/government/collections/femalegenitalmutilation	Home Office
	Female Genital Mutilation: multi agency statutory guidance https://www.gov.uk/government/publications/multiagencystatutory-guidance-on-female-genital-mutilation	DfE, DH and HO Statutory Guidance
	Forced Marriage: Information and Practice Guidelines https://www.gov.uk/guidance/forced-marriage	FCO and HO

Health and Well-Being	Fabricated or Induced Illness: safeguarding children https://www.gov.uk/government/publications/safeguardingchildr en-in-whom-illness-is-fabricated-or-induced	DfE, department for Health and HO
	Rise Above: Free PSHE resources on health, well-being and resilience https://www.pshe-association.org.uk/curriculum-andresources/resources/rise-above-schools-teaching-resources https://www.coramlifeeducation.org.uk/scarf/	Public Health England
	Medical Conditions: Supporting children in school https://www.gov.uk/government/publications/supportingpupilsat-school-with-medical-conditions--3	DfE Statutory Guidance
	Mental Health and Behaviour https://www.gov.uk/government/publications/mentalhealth-andbehaviour-in-schools--2	DfE advice
	Rise Above https://riseabove.org.uk/	DfE advice
Homelessness	Homelessness: How local authorities should exercise their functions https://www.gov.uk/guidance/homelessness-code-ofguidancefor-local-authorities https://www.bromley.gov.uk/info/200052/housing_advice/281/homelessness https://www.bromley.gov.uk/downloads/file/1293/homelessness_strategy_2018-23	HCLG
Online	Sexting: responding to incidents and safeguarding children https://www.gov.uk/government/groups/uk-council-forchildinternet-safety-ukccis https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/896323/UKCIS_Education_for_a_Connected_World_.pdf	UK Council for child internet safety
Private Fostering	Private Fostering: Local Authorities https://www.gov.uk/government/publications/children-act1989private-fostering https://www.bromley.gov.uk/info/159/fostering/990/private_fostering https://www.bromleysafeguarding.org/articles.php?id=638	DfE Statutory Guidance

Radicalisation	Prevent duty guidance https://www.gov.uk/government/publications/preventdutyguidance	HO Guidance
	Prevent duty advice for schools https://www.gov.uk/government/publications/protectingchildrenfrom-radicalisation-the-prevent-duty	DfE advice
	Managing the risk of radicalisation advice for schools https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation/managing-risk-of-radicalisation-in-your-education-setting	DfE Advice
	Educate against Hate Website https://educateagainsthate.com/	DfE and HO
	Prevent E-Learning https://www.elearning.prevent.homeoffice.gov.uk/la2/screen1.html https://shop.melearning.co.uk/learning/bromley/	DfE advice
Violence	Gangs and youth violence for schools and colleges https://www.gov.uk/government/publications/advice-toschoolsand-colleges-on-gangs-and-youth-violence	HO Advice
	Violence against women and girls https://www.gov.uk/government/publications/violence-against-women-and-girls-national-statement-of-expectations-and-commissioning-toolkit	HO Strategy
	Violence against women and girls: national statement of expectations for victims https://www.gov.uk/government/publications/violenceagainstwomen-and-girls-national-statement-ofexpectations	HO Guidance
	Serious violence strategy https://www.gov.uk/government/publications/seriousviolencestrategy	HO Strategy
Modern Slavery	NRM https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-of-modern-slavery-england-and-wales	Gov.uk Guidance

Special Educational Needs and Disabilities Information	SENDIASS Find your local IAS service (councilfordisabledchildren.org.uk)	Local Authority service