



Gloverspiece Minifarm & School



Gloverspiece Safeguarding and Child Protection Policy

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Gloverspiece Safeguarding Contact Details

Position	Name	Phone	e-mail
Designated Safeguarding Lead (DSL)	Jo Evans	07740340979	jo.evans@gloverspieceminifarm.co.uk
Deputy DSL	Liam Allibone	07936021841	liam@gloverspieceminifarm.co.uk
Deputy DSL	Emma Raymond	07894804579	emma.raymond@gloverspieceminifarm.co.uk
Deputy DSL	Jennifer Chaudry	07715625692	jen@gloverspieceminifarm.co.uk
Deputy DSL	Antonia Morris	07842487753	antonia@gloverspieceminifarm.co.uk
Deputy DSL	Naomi Cambray	07528108550	naomi@gloverspieceminifarm.co.uk
Deputy DSL	Holly Fereday	07728728910	holly@gloverspieceminifarm.co.uk
Headteacher, Proprietor & Safeguarding Proprietor	Lynne Duffy	07918026036	lynne@gloverspieceminifarm.co.uk

Worcestershire's Education services contacts

Position	e-mail
Local Authority's Designated Officer (LADO)	LADO@worcestershires.gov.uk
Education Safeguarding Adviser	dhannibal@worcestershires.gov.uk
Education Welfare/Children Missing Education	cme@worcestershires.gov.uk
Early Help/Family Support	FamilySupport@worcestershires.gov.uk
Elective Home Education	ElectiveHomeEducation@worcestershires.gov.uk
Medical Education Team	MET@worcestershires.gov.uk
SEND	sen@worcestreshires.gov.uk
Virtual school	virtualschool@worcesteshires.gov.uk

Other useful contact details

Name	Phone/Email
Birmingham LADO	ladoteam@birminghamchildrenstrust.co.uk
Warwickshire LADO	lado@warwickshire.gov.uk
Coventry LADO	lado@coventry.gov.uk
Childline	0800 1111
NSPCC	0808 800 5000
Kidscape (Anti-bullying helpline for parents)	0845 120 5204
Report Abuse in Education	0800 136 663
National Domestic Abuse Helpline	0800 2000 247
Child exploitation Online Prevent (CEOP)	0870 000 3344



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Introduction

Gloverspiece is committed to safeguarding and promoting the welfare and wellbeing of students and staff. We believe that everyone, without exception, has a right to be safe and to be treated with dignity and respect regardless of background and live a life free from discrimination. Gloverspiece recognises that students learn best when they are healthy, safe and secure.

Safeguarding and promoting the welfare of children is defined as: providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, whether that is within or outside the home, including online; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. (Keeping Children Safe in Education, September 2025.) This policy applies to all students at Gloverspiece.

The purpose of this policy is to inform all staff, parents, carers (including guardians), contractors, third parties and volunteers about Gloverspiece's responsibilities for safeguarding children and to enable all parties to have a clear understanding of how these responsibilities should be carried out. It applies wherever staff members are working with students – even where this is away from Gloverspiece, such as on educational visits or when delivering lessons online.

This policy is published on the Gloverspiece's website and is also available to parents of current and prospective students from the office on request. Large print or other accessible formats can also be made available.

The policy is in accordance with Worcestershire's Educational Safeguarding Team.

This policy is also in accordance with current legislation and the following statutory guidance:

- Keeping Children Safe in Education (KCSIE) September 2025 (KCSIE)
- Working Together to Safeguard Children December 2023 (WTSC)
- Prevent Duty Guidance for England and Wales (December 2023)
- Education (Independent School Standards) Regulations 2014
- What to do if you are worried a child is being abused – advice for practitioners (March 2015)
- Safeguarding children and young people (October 2018)
- Disqualification Under the Childcare Act (August 2018)
- Statutory framework for the Early Years Foundation Stage (January 2024)
- Children Missing Education September 2016
- Relationships Education, Relationships and Sex Education and Health Education (2019)
- The Equality Act (2010)
- The Human Rights Act (1998)

We are advised by the members of the Worcestershire Safeguarding Team, whom the DSL consults on safeguarding matters. Contact details can be found in section 1 of this policy.

Every complaint or suspicion of abuse from within or outside of Gloverspiece will be taken seriously and action will be taken in accordance with this policy.



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Principles

Gloverspiece expects all staff (including the proprietor and volunteers) to share our commitment to safeguarding and promoting the welfare of all students in our care. To achieve this, Gloverspiece seeks to create a safe environment with a strong nurture team, where students who have been subject to any form of abuse can report the matter confident that it will be taken seriously, they will not be made to feel ashamed of making a report and will be fully supported. Staff are trained to listen to students' concerns, identify issues early and respond appropriately following agreed procedures. Gloverspiece will consider, at all times, what is in the best interest of the child.

Gloverspiece will take all reasonable measures to:

- Ensure that we practise safer recruitment in checking the suitability of staff and volunteers (including staff employed by other organisations) to work with student and young people. Staff recruitment procedures are outlined in detail in our Safer Recruitment Policy
- Ensure that, where staff from other organisations are working with our students on another site, we have received confirmation that appropriate child protection checks and procedures apply to those members of staff and that any such checks do not raise any issues of concern in relation to the suitability of those staff members working with students
- Support students in need through early intervention and, where appropriate, support them in co-operation with multi-agencies who are working to the Common Assessment Framework (CAF) and as part of the Team around the Child (TAC) approach
- Be alert to signs of abuse, both at Gloverspiece and from outside and to protect each student from any form of abuse, whether from an adult or another student
- Deal appropriately with every suspicion or complaint of abuse and support students who have been abused in accordance with their agreed child protection plan
- Design and operate procedures which promote this policy, but which, so far as possible, ensure that teachers and other staff who are innocent are not prejudiced by false allegations
- Be alert to the needs of students with physical and mental health conditions
- Operate robust and sensible health and safety procedures
- Operate clear and supportive policies on drugs, alcohol and substance misuse
- Assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area
- Identify children who may be vulnerable to radicalisation, and know what to do when they are identified
- Take all practicable steps to ensure that Gloverspiece premises are as secure as circumstances permit
- Teach students about safeguarding issues and about how to keep themselves safe (including online and when working from home online)
- Ensure that any deficiencies in our child protection and safeguarding procedures are remedied without delay



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Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. All staff (including the proprietor, contractors and volunteers) are under a general legal duty to:

- Contribute to providing a safe environment in which students can learn
- Consider at all times the best interests of the student and take action to enable all students to have the best outcomes
- Attend appropriate safeguarding and child protection training on an annual basis or additionally as directed by the DSL
- Be aware of the indicators of the different forms of abuse and neglect and of emergent mental health issues
- Assist children in need and to protect children from abuse, neglect, exploitation, radicalisation and extremism
- Be familiar with Gloverspiece's policies pertaining to safeguarding and child protection procedures and follow them
- Know how to access and implement the procedures, independently if necessary
- Keep a sufficient record of any significant complaint, conversation or event
- Report any matters of concern to the DSL or, DDSL, to one of the key contacts in accordance with this policy
- Support social services and any other agencies following any referral

The Designated Safeguarding Lead (DSL)

Gloverspiece has appointed a Designated Safeguarding Lead (DSL) who is a senior member of staff and member of the leadership team. The DSL takes lead responsibility for safeguarding (including on-line safety) and child protection and is the first point of contact for parents, pupils, staff and others if they have any concerns about safeguarding or child protection. Gloverspiece also has Deputy DSL's, ensuring that there is always an appropriately trained and designated person on site at all times.

The DSL will be given the time, funding, training, resources and support to ensure they are able to fulfil all the key aspects of their role as described in KCSIE (Sept 2025):

- **Managing Referrals:** the DSL will manage the referral of cases of suspected abuse, neglect, radicalisation or any other relevant issue to the Local Authority Children's Social Care, Channel programme, DBS and/or Police as appropriate.
- **Working with others:** the DSL will be the principal point of contact for all staff functions within and outside of Gloverspiece in the management of a case. They will promote supportive relationships with parents and carers to safeguard students' welfare, be able to identify the causes and consequences of issues that children are experiencing and to support staff to make appropriate adjustments in the provision of educational programmes.
- **Information sharing and managing the child protection file:** the DSL is responsible for keeping child-protection files up to date with accurate and complete records of any actions or decisions taken and ensuring these confidential records are securely stored and, where appropriate, transferred to a new school promptly.



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- **Raising Awareness:** the DSL is responsible for reviewing and updating Gloverspiece's safeguarding policy at least annually, for ensuring that all staff members have had appropriate training regarding its implementation, and that parents can access the policy and know that Gloverspiece may make referrals where abuse, neglect or exploitation is suspected.
- **Training, knowledge and skills:** the DSL will receive the appropriate level of training, together with regular updates, to ensure they are able to understand the unique risks associated with online safety, to be confident that they have the relevant knowledge and up-to-date capability required to keep children safe whilst they are online at Gloverspiece and to diagnose and respond to the specific needs of vulnerable children and work effectively with agencies such as the LADO, the Police and the Channel agency.
- **Providing support to staff:** the DSL should receive sufficient support and training so that they can support staff and help them feel confident about welfare, safeguarding and child protection matters, including referrals and taking into account safeguarding, welfare and SEN in the provision of academic and pastoral support.
- **Understanding the views of children:** the DSL should, through training, develop the knowledge and skills needed to encourage a culture of listening to children and taking account of their wishes and feelings among all staff. They should promote an understanding of the difficulties that children may have in approaching staff about their circumstances and help staff consider how to build trusted relationships which facilitate communication.

Note: A full description of the responsibilities of the DSL is set out in Appendix 5 of this policy.

Deputy Designated Safeguarding Lead (DDSL)

The DDSLs are trained to the same standard as the DSL and, in the absence of the DSL, carry out those functions necessary to ensure the ongoing safety and protection of students. In the event of a long-term absence of the DSL, one of the Deputies will assume responsibility for all the activities described above. On a day-to-day basis safeguarding activities may be delegated to the DDSLs but final lead responsibility for safeguarding and child protection remains with the DSL.

Headteacher

The Headteacher is responsible for ensuring that the procedures outlined in this policy are followed on a day-to-day basis. To this end the Headteacher will ensure that:

- The safeguarding and child protection policy and procedures adopted by the Proprietor are implemented and followed by all staff
- Sufficient time, training, funding, support and resources necessary to enable the DSL and DDSLs to carry out their roles effectively are allocated, including the assessment of students and attendance at strategy discussions and other necessary meetings
- Matters which affect student welfare are adequately risk-assessed by appropriately trained individuals and ensure that the relevant findings are implemented, monitored and evaluated
- Systems which operate with the best interests of the student at heart are in place for students to express their views and give feedback
- All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the Gloverspiece whistleblowing policy and low level concerns procedures



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- Students are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online
- Safer recruitment procedures are being adhered to in line with Part 3 of KCSIE, September 2025
- They act as the 'case manager' in the event of an allegation of abuse made against another member of staff and liaise with the Local Authority Designated Officer (LADO)
- They notify the Disclosure and Barring Service and, where appropriate, the Teaching Regulatory Authority and/or the Police of anyone who has harmed or may pose a risk to a child

Proprietor

The Proprietor has overall responsibility to ensure compliance with child protection statutory requirements and actively promote the wellbeing of pupils. It is also the role of the Proprietor to provide scrutiny of the safeguarding policy and safeguarding practice. The Proprietor takes seriously their responsibility to fulfil their duty of care in promoting the welfare of children, ensuring their security and protecting them from harm. To this end, the Proprietor will ensure that:

- They facilitate a whole-school approach to safeguarding which involves everyone at Gloverspiece, ensuring safeguarding and child protection underpin all aspects of process and policy development
- An effective, up-to-date safeguarding child protection policy is in place that is clear and easy to understand for staff, students, parents and carers and is made available on the website
- Other policies, as prescribed in Part 2 of KCSIE, are in place and operational
- The obligations imposed by the Human Rights Act (1998) and the Equality Act (2010) are met
- Students are being taught about how to keep themselves and others safe, including online, and that provision is tailored to the specific needs and vulnerabilities of individual children, including those who are victims of abuse and/or have SEND needs
- Required pre-employment checks are being carried out in a timely way and correctly recorded in the Single Central Register
- An appropriate member of staff from the Gloverspiece's leadership team is appointed to the role of DSL
- All staff receive safeguarding induction and ongoing training in accordance with this policy
- Gloverspiece safeguarding arrangements take into account the procedures and practice of the Worcestershire's Safeguarding Team
- Gloverspiece contributes to inter-agency working, including providing a co-ordinated offer of early help when additional needs of students are identified
- Clear systems and processes are in place for identifying and managing students with mental health problems
- Child protection files are maintained and, where appropriate, such records are transferred to a student's new school or School in accordance with statutory guidance
Appropriate filters and monitoring systems are in place to keep children safe online and that these are reviewed regularly
- Gloverspiece reports to its local authority (Worcestershire) any student who joins or leaves us at non-standard transition times in line with statutory and local authority guidance



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Safeguarding Proprietor

Lynne Duffy is the Safeguarding Proprietor who takes lead responsibility for monitoring the operation of safeguarding arrangements at Gloverspiece This is done in a number of ways, these being:

- Conducting discussions about safeguarding matters with the DSL at least once a term and more regularly, if needed
- Liaising with the local authority and/or partner agencies where appropriate

The contact details for the Safeguarding Proprietor are set out in Section 1 of this policy.

Key personnel

The DSL at Gloverspiece is Jo Evans, and a member of the Senior Leadership Team. If the DSL is unavailable, or it is a Friday (Jo's non working day), the role will be carried out by the Deputy DSL's, Liam Allibone, Jennifer Chaudry, Emma Raymond, Antonia Morris, Naomi Cambray and Holly Fereday. The DSL or Deputy DSL's are always available when Gloverspiece is open to discuss safeguarding concerns with staff, either in person or via telephone or email.

If the DSL and Deputy DSLs are unavailable, the role will be carried out by the Headteacher. Outside operating hours and during out-of-term activities, the Head teacher, Lynne Duffy, will be the key contact.

Liam Allibone and Jo Evans are the designated members of staff who would oversee the welfare of any looked-after children.

Contact details for all the above are contained in section 1 of this policy.

Staff training

Staff training encourages all members of staff to maintain an attitude of 'it could happen here' where abuse and neglect are concerned.

Induction training for all new members of staff, or volunteers, includes formal child-protection training which covers:

- This safeguarding policy and related policies on Anti-Bullying and Whistleblowing*
- Part 1 and Annex B of KCSIE*
- The role, identity and contact details of the DSL and Deputy DSL
- Online Safety policy
- Behaviour policy*
- The Staff Code of Conduct, including low-level concerns procedures*
- Gloverspiece's policy on whistleblowing

** Copies of these documents will be provided either in paper form or electronically as part of the induction process and new staff will be required to sign a declaration confirming they have read and understood them. A proportional, risk-based approach will be taken to determine the level of information provided to volunteers.*



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All staff, including the Headteacher, will undertake appropriate child protection training which is updated at least every two years. In addition, all staff will receive safeguarding updates delivered through a combination of updating emails from the DSL and/or CPD training. Safeguarding training is coordinated by the DSL and includes online safety and Prevent training, where appropriate.

All staff receive updated copies of Gloverspiece policies referred to above and are required to confirm that they have read and understood them. In addition, Part 1 and, where appropriate, Annex B of KCSIE are reissued to staff whenever this statutory guidance is updated by the DfE. Staff training provides an opportunity to check and consolidate their understanding of the policies. Staff can also access the policies and further reading in the Shared Public Folder and on our website.

The DSL team will regularly assess the appropriate level and focus for staff training so that it can respond to specific safeguarding concerns such as mental health, child-on-child abuse, online safety, radicalisation, child sexual exploitation, child criminal exploitation, sexual violence and harassment, and female genital mutilation (FGM).

The DSL and Deputy DSL's undertake training that is in accordance with locally agreed procedures to provide them with the knowledge and skills necessary to carry out their role. This training includes Prevent awareness training and will be updated every year. Additional specialist training will be obtained for those who have specific responsibility for looked-after children. They also refresh their knowledge and skills at regular intervals (and at least annually) by following developments in safeguarding to:

- Keep abreast of best practice for promoting a culture of listening to children
- Remain up to date on the mechanics of inter-agency working as operated by Worcestershire Safeguarding Team
- Understand the assessment process for providing early help and intervention, for example through locally agreed common assessment processes such as early-help assessments
- Have an up-to-date working knowledge of how local authorities conduct child-protection case conferences so they can contribute to these effectively when required to do so
- Be alert to the specific needs of children in need, those with Special Educational Needs and young carers
- Understand and support Gloverspiece regarding the requirements of the Prevent duty and provide advice and support to staff on protecting children from the risk of radicalisation
- Be able to keep proper written records of concerns and referrals

The Proprietor receives training at least on an annual basis. This training is designed to ensure they understand their responsibilities and equip them with the knowledge to provide strategic advice and to test and assure themselves that the Gloverspiece safeguarding policies and procedures are effective and support the delivery of a robust whole organisation approach to safeguarding.



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Hierarchy of intervention

Worcestershire publishes the '[Worcestershire Safeguarding Children Partnership](#)' that all agencies, professionals and volunteers in the area can use to consider how best to meet the needs of individual children and young people. This guidance provides a summary of thresholds for intervention in relation to a continuum of need, ranging from children who need no additional intervention to those who require intensive help and specialist support. Children's needs are not static, and they may experience different needs – at different points on the continuum – throughout their childhood years.

Within the continuum, there are four levels of intervention:

Level 1: Universal

These are children all of whose health and developmental needs will be met by universal services such as housing, mainstream education, primary health care, community resources alone. Children and young people at this level are achieving expected outcomes. There are no identified unmet needs, or the need is at a low-level and can be met by the universal services or with some limited additional advice or guidance. Children, young people, parents and carers can access these services directly.

Level 2: Low level needs (Early Help)

These are children whose needs are not clear, not known or not being met. They may be vulnerable and showing early signs of abuse and/or neglect. Children and young people at this level are in need of coordinated early help and support from services to prevent problems from escalating and difficult to resolve.

Level 3: Children and families with complex needs (child in need)

Children and families at this level will be facing complex problems which will require an integrated and coordinated response from a number of agencies e.g. children's social services, CAMHS, health services etc. Children at this level, often described as children 'in need', are unlikely to achieve or maintain a satisfactory level of health or development, or their health and development will be significantly further impaired, without the provision of external services.

Level 4: Children with acute needs (child at risk)

These are children who are suffering or are likely to suffer significant harm. This is the threshold for child protection. These children are likely to have already experienced adverse effects and to be suffering from poor outcomes.

Early help

Early help may be provided exclusively by Gloverspiece in cases which do not require a referral to statutory services or in conjunction with third parties where the threshold criteria have been met. The purpose of early help is to improve resilience and outcomes and to prevent problems from escalating. We recognise that young people may face many challenges that put them in need of support and ensure that staff are aware of them. These include stress, peer pressure, body image concerns, mental health and relationship issues.



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Students are encouraged to raise concerns as soon as they are identified, either through their teacher or teaching assistant, Nurture mentor (through weekly check ins, or when needed), their teaching assistant (many are on 1:1 support) or Designated Safeguarding Lead, so that effective early support can be provided.

If staff believe that a student could benefit from early help, they should discuss the matter with the DSL who will, considering Worcestershire's threshold criteria, consider what action should be taken, including whether to make a referral to the Worcestershire Early Help Service.

If early help is provided, the situation will be monitored carefully and a referral to children's social services made if the student's situation does not appear to be improving.

Gloverspiece has various mechanisms to help identify emerging problems, including the Nurture

Team, high levels of staff supervision, the PSHE programme and various policies, including the Antbullying and Online Safety. Staff training also prepares staff to identify pupils who might benefit from early help.

Gloverspiece recognises the increased vulnerability of young people who:

- Are Disabled or have Special Educational Needs (whether or not they have a statutory Education, Health and Care plan) as they are more prone to peer-group isolation or bullying (including prejudice-based bullying)
- Do not have English as a first language
- Are living away from home for the first time
- Are in private foster care
- Are frequently missing from education, care or home, persistently absent from school or not receiving full-time education
- Are faced with challenging family circumstances
- Are showing signs of being drawn into anti-social or criminal behaviour
- Are looked after children
- Are acting as a young carer
- Are misusing drugs or alcohol themselves
- Are gender questioning
- Are at risk of being radicalised or exploited
- Are showing early signs of abuse, neglect or mental health problems
- May be subject to discrimination and maltreatment on the grounds of race, religion, ethnicity, sexual orientation or sexual identity
- Such children may be more likely to need early help. Also, recognising abuse, exploitation or neglect may be more difficult for these young people for many reasons, including:
- Assumptions that indicators of possible abuse such as behaviour, mood or injury relate to a student's disability without further exploration
- Students with Special Educational Needs or Disabilities (SEN/D) can be disproportionately impacted by bullying/child-on-child abuse without outwardly showing any signs
- Communication barriers and difficulties overcoming these barriers
- A disabled student's understanding of abuse



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What to look out for and when to be concerned

All staff should be aware of the types and signs of abuse, neglect and exploitation so that they are able to identify students who may be in need of help or protection. They also must be mindful that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or may not recognise their experiences as harmful. To reduce barriers to a potential disclosure it is incumbent on staff to build trusted relationships with children which facilitate communication. Staff must also exercise professional curiosity and speak to the DSL if they have concerns.

All staff should be aware of the types and signs of abuse and neglect so that they are able to identify pupils who may need help or protection. If staff are unsure, they should always speak to the DSL.

Child abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children (child-on-child abuse). Serious bullying is a form of abuse and therefore will be treated as a child protection concern if there is reasonable cause to suspect a child is suffering, or likely to suffer, significant harm.

Staff should be aware of the four main categories of child abuse which are commonly identified:

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily through a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving



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children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) and is covered in greater detail later in this policy (section 20).

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy 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 or shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Other forms of abuse which staff should be aware of are:

- Child criminal exploitation (CCE)
- Child sexual exploitation (CSE)
- Child-on-child
- Children absent or missing from education
- County lines
- Domestic abuse
- Honour-Based Abuse (HBA) and Female Genital Mutilation (FGM)
- Forced marriage
- Radicalisation
- Sexual violence and harassment (including upskirting)

Further information is provided in Appendices 2 and 3 of this policy and in Part 1 and Annex B of KCSIE.

Contextual safeguarding

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside Gloverspiece and/or can occur between young people outside this environment. This is known as contextual safeguarding. All staff should consider, and especially those within the safeguarding team, whether pupils are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of forms and young people may be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, and serious youth violence.



Signs of abuse

All staff need to be aware that students may be reticent about reporting abuse generally, and particularly so about child-on-child abuse, and therefore need to be vigilant for potential indicators that abuse may be taking place.

Possible signs of abuse include (but are not limited to) the following:

- The student discloses that he or she has been abused, or asks a question which gives rise to that inference
- The student has an injury that cannot be reasonably or consistently explained, or is unusual in type or location
- The student shows signs of injury on a regular or patterned basis
- The student engages in extreme or challenging behaviour or there is a sudden change in the student's behaviour
- The student asks to drop subjects with a particular teacher and seems reluctant to discuss reasons
- The student appears neglected (e.g. dirty, hungry, inadequately clothed)
- The student appears reluctant to return home or has been openly rejected by parents or guardians
- The student's development is delayed in terms of emotional progress
- The student withdraws emotionally – showing a lack of trust in adults
- The student shies away from being touched or flinches at sudden movements
- The student loses or gains weight

Further guidance is provided in Appendix 2. Other sources of information on the signs of abuse include: the DfE advice note [What to do if you're worried a child is being abused \(2015\)](#) and the [NSPCC website](#).

Listening to students and record keeping

Gloverspiece provides a range of opportunities for students to be listened to. Students can speak with Teaching assistants, farm staff, teachers, Nurture team, the Headteacher and a member of the DSL team. Contact details for external agencies such as Childline are on our notice boards.

If a student discloses that they have been abused or neglected in some way, the staff member should:

- Immediately stop any other activity to listen
- Listen carefully to the student and keep an open mind - do not interrupt or be afraid of silences
- Keep in mind that some students may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation
- Limit the questioning to the minimum necessary for clarification using “what, when, how, where” but avoiding leading questions (such as, “has this happened to your siblings?”) that may prejudice an investigation
- Not make any attempt to investigate the incident themselves or decide as to whether or not the student has been abused



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- Reassure the student, but never promise not to tell anyone. Instead, explain who has to be told to ensure that proper action is taken in accordance with this policy
- Reassure the student that what has happened is not their fault and that they were right to tell someone
- Discuss the conversation with the DSL as soon as possible, and take no further action unless instructed to do so by the DSL or the Headteacher
- Only share information on a need-to-know basis
- **Make a full written record of the conversation as set out below**

Staff must record in writing all concerns, discussions and decisions made about a student as soon as possible on a blue cause of concern form (See Appendix 5). The recording must be a clear, precise and factual account of the conversation or observations. Where a child has made a disclosure, the record must include details of:

- Its date, time and place
- What was said and done, by whom and in whose presence
- Any noticeable non-verbal behaviour or words used by the child

The record should be signed by the person making it, using names, not initials. Any other evidence (for example, scribbled notes, mobile phones containing text messages, clothing, computers) must be kept securely and passed on to the DSL as soon as possible. No copies should be retained by the member of staff or volunteer.

Where a report includes an online element, staff should, where possible, avoid viewing illegal images of a child and under no circumstances should such images be forwarded electronically. Further guidance is available on what to do if viewing an image is unavoidable on:

- <https://www.gov.uk/government/publications/searching-screening-and-confiscation>
- [*Sharing nudes and semi nudes: advice for education settings working with children and young people \(December 2020\)*](#).

Procedure to be followed by staff if they have concerns about a student's welfare

If a member of staff has concerns about a student's welfare, including any mental health concerns, **they must inform the DSL as soon as possible**, unless the concerns involve an allegation against a member of staff, in which case the procedures set out in the section *Allegations against members of staff, contractors and volunteers* below should be followed. Staff should not assume that somebody else will act and share information that might be critical in keeping a student safe.

All concerns, discussions, decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements, staff should discuss with the DSL.

If a teacher discovers that an act of female genital mutilation (FGM) appears to have been carried out on a girl under 18, the teacher **must** report this to the police. Unless the teacher has a good reason not to, they should also still inform the DSL. This statutory duty does not apply to suspected cases of FGM or those at risk of FGM, which should both be addressed in accordance with the



safeguarding procedures described in this policy. (For further details, see Annex B of KCSIE and [‘Guidance for Schools’](#) information.)

The normal safeguarding procedures outlined in this Policy must be used when there are concerns about children who may be at risk of being drawn into terrorism.

Parents can report to the DSL on the welfare of any student at Gloverspiece, whether their own child or not. If preferred, parents may discuss concerns in private with the student’s Headteacher or other member of staff, who will notify the DSL.

Any member of staff may refer a matter to children’s social services directly. This could happen in exceptional circumstances such as in an emergency or if there is a genuine concern that appropriate action has not been taken.

Duties of the DSL on being notified of a concern about a student’s welfare

When the DSL or DDSL’s are notified of any concerns about a student’s welfare, they will decide on the appropriate course of action. In particular, the DSL will decide whether a referral should be made to children’s social services.

Factors that the DSL should bear in mind when making their decision include:

- The best interests of the child
- The nature and seriousness of the complaint
- Contextual factors
- The referral threshold set by the relevant Local Authority
- The student’s wishes or feelings
- The inter-agency procedures of the Local Safeguarding Children Partnership
- Where relevant, local information sharing protocols relating to Channel referrals

If the DSL decides not to make a referral, but to support the student with early help, the DSL will keep the situation under review and consider a later referral to children’s social services if the student’s situation does not appear to be improving.

Members of the DSL team are responsible for maintaining written safeguarding records. These records are confidential and the only personnel within the school who have access to them are the DSL, DDSL and the Safeguarding Proprietor. Such records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- Note of any actions taken, rationale for decisions reached and the outcome

The DSL is responsible for ensuring that all safeguarding records are accurate, up to date and that recording is of a high standard.

Making a referral to children’s social services

When a student is not considered at risk of harm, but still has an unmet need that could mean they are in a Child in Need, a referral should be made as soon as possible by the DSL to Children’s Social



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Care in the local authority in which the pupil lives. Parental consent for referrals of this type is not required in these circumstances. However, it is best practice for such concerns to be discussed first with parents and any subsequent referral to be made transparently with their knowledge. Where a child and family would benefit from coordinated support from one or more agency (for example: education, health, housing, police) there should be an inter-agency early-help assessment and procedures will be put in place by children's services to arrange this. Gloverspiece will coordinate with the local agencies involved.

If a student is in **immediate danger** or is at **risk of harm**, a referral should be made to children's social services and/or the police **immediately**. Further guidance on when to call the police is provided by the [NPCC - when to call the police](#). Gloverspiece is not required to obtain parental consent prior to a referral being made.

If the initial referral is made by telephone, the DSL should confirm the referral in writing. Confirmation of the referral and details of the decision on what action will be taken should be received from the Local Authority within one working day. If this is not received, the DSL should contact children's social services again.

If the DSL is not sure whether a referral should be made, they will consult with the Child and Family Contact team social worker on a no-names basis. However, if at any stage sufficient concern exists that a pupil may be at risk of harm or in immediate danger, a referral to children's social services and/or the police will be made immediately.

Anyone can make a referral, although if a referral is made by someone other than the DSL, the DSL should be informed as soon as possible.

If, after a referral, the student's situation does not appear to be improving, the DSL should contact children's social services again to follow the matter up, to ensure both that their concerns are addressed and that the student's situation improves.

Where relevant, Gloverspiece will co-operate with the Channel panel and the police in providing any relevant information so that each can effectively carry out its functions to determine whether an individual is vulnerable to being drawn into terrorism. Gloverspiece will respond to requests for information from the police promptly, and in any event within five to ten working days.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to local authority children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, Gloverspiece will consider whether any disciplinary action is appropriate against the individual who made it.



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Informing parents

Parents will usually be informed of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult with the Local Authority Designated Officer (LADO), children's social services, the police and/or the Headteacher before discussing details with parents.

For Channel referrals, the DSL will consider seeking the consent of the pupil (or their parent/guardian) when determining what information can be shared. Whether or not consent is sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public.

When Gloverspiece decides to refer a particular complaint of abuse to social services or the police, the parents/guardian and pupil will be informed in writing of their right to make their own complaint or referral to social services or the police, where appropriate, and will be provided with contact names, addresses and telephone numbers.

For the avoidance of doubt, referrals do not require parental consent. Staff must act in the best interests of the child, even if this means making a referral against the parents' wishes.

Allegations about members of staff, contractors and volunteers

Guidance to staff

Guidance is given to staff to be circumspect about placing themselves in situations which may

- Put themselves or their students at risk of harm
- Give rise to allegations of abuse

To reduce the risk of allegations, staff should be aware of safer working practices and should be familiar with the detailed guidance on acceptable behaviour and actions contained in the Staff Code of Conduct, which is issued to all staff. Particular care should be taken where staff have one-to-one meetings with a student.

The following procedures will be used where it is alleged that a member of staff, contractor or volunteer has:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates they would pose a risk of harm to children
- Behaved or may have behaved in a way (in or outside of Gloverspiece) that indicates they might not be suitable to work with children. The incident may not necessarily involve children but may raise concerns that such behaviour might be replicated against a child (e.g. domestic violence at home)

These criteria are often referred to as the allegation or harms threshold. The procedures outlined below aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false, malicious or unfounded allegations. The procedures follow Part 4 of KCSIE (September 2025).



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Reporting an allegation about staff

If an allegation is made about staff that appears to meet the criteria:

- Where an allegation is made about a member of staff, the DSL, contractor or volunteer, the matter should be reported immediately to the Headteacher (Lynne Duffy). The adult to whom the allegation relates should not be informed without the explicit consent of the Local Authority Designated Officer (LADO), the person designated by the local authority to be involved in the management of allegations against people who work with children.
- Allegations about the Headteacher should be reported directly to the LADO, without first notifying the Headteacher.
- The Headteacher/Proprietor who receives any such allegation is referred to in these procedures as the 'case manager'.

Action to be taken by the case manager

- Before contacting the LADO, the case manager will conduct basic enquiries in line with Worcestershire's procedures to establish the facts to help determine whether there is any foundation to the allegation. Nothing must be done at this initial stage that could jeopardise a future police investigation.
- If the case manager is unsure whether the allegation meets the criteria, the LADO will be consulted for advice.
- Any allegations meeting the criteria will be dealt with in accordance with the local authority's arrangements for managing allegations. All such allegations must be dealt with as a priority to avoid any delay.
- The case manager will immediately (and in any event within one working day) discuss the matter with the LADO before further action is taken. The case manager may also consult with the DSL, but no attempt will be made to formally investigate the allegation until the LADO is consulted. The purpose of the initial discussion between the case manager and the LADO is to consider the nature, content and context of the allegation and to agree a course of action. All discussions with the LADO should be recorded in writing.
- The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern, in which case this decision and a justification for it will be recorded by both the case manager and the LADO, and agreement reached on what information should be put in writing to the individual concerned and by whom.
- In situations where a person is deemed an immediate risk to children or where there is evidence of a possible criminal offence, the case manager may, in consultation with the LADO, request police involvement from the outset.
- Where an adult makes an allegation to Gloverspiece that they were abused as a child, the individual will be advised to report the allegation to the police. Non-recent allegations made by a pupil will be reported to the LADO in line with Worcestershire's procedures for dealing with such allegations. The LADO will then coordinate with the local authority children's social care department and the police.



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Disclosure of information

- The case manager will inform the accused person of the allegation as soon as possible after the LADO has been consulted and, if appropriate, local authority children's social care and the police.
- The parents of the student involved will be informed of the allegation as soon as possible if they do not already know of it, although where external agencies are involved, the case manager will not inform the accused or the parents until it has been agreed what information can be disclosed. Parents will be kept informed of the progress of the case, only in relation to their child: no information can be shared regarding the member of staff.
- The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

Investigation

- Investigations will usually be undertaken by a senior member of staff, under the guidance of the LADO. However, depending on the nature and complexity of an allegation, the investigation may instead be conducted by external agencies, such as social services or the police. In some cases, the LADO may ask for further enquiries to be made before a formal decision is reached about how to proceed. When this occurs, the LADO will provide specific guidance as to how and by whom the investigation should be conducted.
- Where an external agency is conducting the investigation rather than Gloverspiece, we will cooperate fully with the external investigators. No internal investigation into possible breaches of our disciplinary code will commence until any external investigation or criminal proceedings are complete.
- The case manager will monitor the progress of the case to ensure that it is being dealt with as quickly as possible in a thorough and fair way. Wherever possible, the first review should take place within four weeks of the initial assessment. Subsequent reviews will take place at fortnightly (and no longer than monthly) intervals whilst the investigation is ongoing.
- Gloverspiece will not cease its investigations if the person involved leaves, resigns, ceases to provide their services, or refuses to cooperate. Records will be kept of the nature of the allegation and any supporting evidence used to determine whether or not, on the basis of information available, the allegation is substantiated. The person involved will be notified in writing of the outcome of the investigation process.
- In accordance with DfE statutory guidance, the following definitions will be used when determining the outcome 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 cause harm to the person subject of the investigation.
 - False: there is sufficient evidence to disprove the allegation
 - Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
 - Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made



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Support

- Gloverspiece has a duty of care towards its employees and will ensure that effective support is provided for anyone facing such an allegation. A representative will be appointed to keep him or her informed of the progress of the case.
- Gloverspiece will also provide access to counselling or medical advice, where appropriate.
- Gloverspiece will not prevent social contact with work colleagues and friends, when staff are suspended, unless there is reason to believe this may be prejudicial to the gathering and presentation of evidence.
- Support will also be offered to the student(s) affected and their parents or guardian. Gloverspiece will consult with the children's social services, or the police as appropriate, as to how this can be done in the most suitable and effective way.

Suspension

- Suspension will not be an automatic response to an allegation and will only be considered in a case where there is cause to suspect that a student, or other students at the School, is/are at risk of significant harm, or where the allegation is so serious that it might be grounds for dismissal. Gloverspiece will consider whether the result that would be achieved by suspension could be obtained by alternative arrangements, such as redeployment. A member of staff will only be suspended if there is no reasonable alternative. Gloverspiece will balance the need to ensure the safety and welfare of the student with the need for a full and fair investigation. The LADO will be consulted as to the appropriate action to take.
- If suspension is deemed appropriate, the reasons and justification will be recorded by Gloverspiece and the individual notified of the reasons for the suspension. Gloverspiece will ensure that the suspended person is given the contact details for the representative who has been appointed to keep him or her informed about the progress of the case.
- If it is decided that the person who has been suspended should return to work, Gloverspiece will consider how to facilitate this: for example, whether a phased return would be appropriate. Gloverspiece may provide a mentor and will also consider how to manage contact with the student who made the allegation.

Confidentiality and information sharing

- Gloverspiece will make every effort to guard the privacy of all parties during and after an investigation into an allegation. It is in everyone's best interest to maintain this confidentiality, in order to ensure a fair investigation with minimum impact on all parties.
- A breach of confidentiality will be taken seriously and may warrant its own investigation. It is a criminal offence to publish information that could lead to the identification of a member of staff who is the subject of an allegation before they are charged with an offence. Publication includes any speech, writing, relevant programme or other communication, in whatever form, which is addressed to the public at large or any section of the public.
- The case manager will take advice from the LADO, police and children's services, as appropriate, to agree:



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- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make the parents or guardian of the student 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, or when, it arises
- Where the police are involved, wherever possible the School will ask the police to obtain consent from the individuals involved to share their statements and evidence for use in any subsequent disciplinary process.

Unsubstantiated, unfounded, false or malicious allegations

- If an allegation by a student is determined to be unsubstantiated, unfounded, false or malicious, the case manager should consider the following actions:
 - If the student who made the allegation is in need of help or may have been abused by someone else and, under such circumstances, whether a referral to social services is appropriate
 - Whether to take disciplinary action against the student in accordance with the Behaviour Policy.
- If a parent has made a deliberately invented or malicious allegation the Headteacher will consider whether to require that parent to withdraw their child from Gloverspiece, on the basis that they have treated the organisation or a member of staff unreasonably
- Whether or not the person making the allegation is a student or a parent (or other member of the public), Gloverspiece reserves the right to contact the police to determine whether any action might be appropriate.

Substantiated allegations

- If an allegation is substantiated and the member of staff, contractor or volunteer is dismissed because they are unsuitable to work with children a report to the Disclosure and Barring Service will be made promptly, and in any event within one month of the person leaving Gloverspiece.
- Settlement agreements, including a form of words for a reference, will not be used in cases where a member of staff, volunteer or contractor resigns or ceases to provide his or her service, where there are allegations that indicate the person is a risk or poses a risk of harm to children. Resignation or ceasing to provide services will not prevent a referral being made to the Disclosure and Barring Service where appropriate.
- If a teacher has been dismissed, or would have been dismissed had they not resigned, in cases involving unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction for a relevant offence, Gloverspiece will give separate consideration to whether a referral should be made to the Teaching Regulatory Authority. Gloverspiece will follow the advice set out in the TRA documents: [Teacher misconduct: information for teachers](#) and [Teacher misconduct: the prohibition of teachers](#) (as updated from time to time) to decide whether a referral should be made.
- At the conclusion of a case in which an allegation is substantiated, the LADO will review the circumstances of the case with the case manager to determine whether any improvements could be made to our procedures to prevent the occurrence of similar



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events in the future. Consideration will also be given to how the investigation process was managed, including, where appropriate, the use of suspension of the accused. The case manager will produce a written report that will be presented to the governors without delay.

Record keeping and references

- Details of allegations that are found to be malicious or false will be removed from personnel records, unless the individual gives their written consent for the retention of the information. For all other allegations, a comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken, decisions made and the outcome (*substantiated, unfounded or unsubstantiated*) will be kept on the employee's file. A copy will be provided to the individual concerned, where agreed by local authority children's care or the police, and a declaration on whether the information will be referred to in any future reference. Such records will be retained at least until the employee reaches the normal pension age (or for a period of ten years from the date of the allegation, if this is longer).
- When providing employer references, Gloverspiece will not refer to any allegation or history of allegations where the allegation(s) have been proven to be false, unfounded, unsubstantiated, false or malicious. Factual information (not opinions) will be included in references, where an allegation has been substantiated.

Learning lessons

Throughout the investigation process into a safeguarding allegation about a member of staff and at the conclusion of a case, irrespective of whether the allegation is substantiated, Gloverspiece will review the circumstance of the case to see if there are any improvements that can be made in its practice or policy which may prevent similar cases in the future. Such reviews will be conducted by the case manager in consultation with the LADO and will also consider how future investigations of a similar nature could be carried out more effectively, including any issues arising from any decision to suspend a member of staff, the duration of the suspension and whether or not the suspension was justified. The case manager will submit a report the Proprietors summarising the outcome of the review.

Low-level concerns

As part of a whole organisation approach to safeguarding, Gloverspiece seeks to promote a culture in which all concerns about all adults working in or on behalf of Gloverspiece are dealt with promptly and appropriately. The purpose of the low-level concerns procedures is to create and embed a culture of openness, trust and transparency in which our values and expectations of staff behaviour as set out in the Code of Conduct are constantly lived, monitored and reinforced by all staff.

A "low-level" concern is any concern – no matter how small, and even if no more than causing a sense of unease or a nagging doubt – that an adult has acted in a way that:

- Is inconsistent with the Code of Conduct, including inappropriate conduct outside of work
- Does not meet the allegation threshold or is otherwise not serious enough to consider a referral to the LADO. If Gloverspiece has any doubt as to whether the information



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shared about a member of staff meets the harms threshold, advice from the LADO will be sought.

NB: The term 'low-level' does not mean that the concern is insignificant; it simply means the behaviour does not meet the allegation threshold as defined in KCSIE.

Inappropriate behaviour can exist on a wide spectrum, from that which is inadvertent or thoughtless through to that which is ultimately intended to enable abuse. Examples of such behaviour could include but are not limited to: being overly friendly with students; showing favouritism; taking photographs of students on a personal device; or humiliating students.

Low-level concerns may arise in several ways and from a number of sources: for example, suspicion; complaint; or disclosure made by a student, parent or another adult within or outside the organisation; or as a result of vetting checks undertaken.

Staff are required to report any concerns about any adult (including a person employed by a supply agency or a contractor) to the Headteacher (or nominated deputy). In the case of supply staff, and contractors their employers will be notified so any patterns of inappropriate behaviour can be identified. Where the concern relates to the Headteacher, it should be reported directly to the LADO. Such reports should be made without undue delay. Staff do not need to be able to determine whether their concern is a low-level concern or whether it meets the threshold of an allegation. This determination will be made by the Headteacher/LADO when the matter has been investigated. A member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, a member of staff, for whatever reason, may have behaved in a manner which, on reflection, falls short of the standard set out in the Staff Code of Conduct. Under such circumstances, the member of staff should make a self-referral to the Headteacher as soon as possible. Doing so demonstrates transparency, facilitates effective management of the issue and can reduce the risks of misunderstandings and false allegations.

Full details of how the Headteacher (or nominated deputy) will go about investigating low-level concerns are set out in an annex to the Staff Code of Conduct. In brief, they will gather as much evidence as possible by speaking directly to the member of staff raising the concern (unless the concern has been raised anonymously), to the individual involved and to any witnesses.

All low-level concerns, including those determined to be unfounded, will be recorded in writing by the Headteacher. The record will include details of the concern, the context in which the concern arose, and any actions taken and decisions reached (and the rationale for them), and the eventual outcome. The name of the individual sharing their concerns will be noted. If the individual wishes to remain anonymous, then this will be respected as far as is reasonably possible. Records of low-level concerns are confidential and securely stored by the Head teacher in accordance with the Data Protection Act 2018 and the UK General Data Protection regulation until the individual ceases to be employed by Gloverspiece

Low-level concerns which relate exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in employment references provided by Gloverspiece. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it will be referred to.



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Records of low-level concerns will be reviewed at least termly by the DSL and Proprietors to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. Where a pattern of behaviour is identified consideration will be given to whether disciplinary procedures should be invoked, the matter should be escalated to the LADO and, more broadly, whether existing policies need to be revised and/or additional training is required to address wider cultural issues and minimise the risk of recurrence in the future.

Arrangements for dealing with child-on-child abuse and allegations

Most instances of students causing harm to each other will be dealt with under the Anti-bullying and Behaviour Policies. However, all staff should be aware that safeguarding concerns can arise as a result of conduct by a student towards another (sometimes referred to as child-on-child abuse). This type of abuse can happen both inside and outside of Gloverspiece and online.

Examples of pupils' conduct towards each other that could raise safeguarding concerns are:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical violence such as hitting, kicking, shaking, biting, choking, 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
- Upskirting, which typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or to cause humiliation or distress. (Upskirting is now a criminal offence. Girls or boys can be a victim.)
- Consensual and non-consensual sharing of nude and/or semi-nude images and/or videos (also known as sexting, or youth-produced sexual imagery)
- 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)

It is more likely that girls will be victims and boys perpetrators of child-on-child abuse. Child-on-child abuse also often manifests itself differently for boys than it does for girls. For example, girls seem to be at greater risk of sexual assault and/or exploitation, whereas boys seem to be at greater risk of physical gang-related violence and serious youth violence.

Students with Special Educational Needs or Disabilities are particularly vulnerable to child-on-child abuse. All students at Gloverspiece have Special Educational Needs.

A child or young person who is (or is perceived to be) lesbian, gay, bisexual or transsexual (LGBT+) may mean that they can be targeted by other children and subjected to harm because of this. This



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risk can be compounded where such students lack a trusted adult with whom they can be open. With this in mind, Gloverspiece provides a number of 'safe spaces' for these children to speak out and share their concerns, including Nurture sessions and PSHE lessons.

Whilst sexual harassment and sexual violence are forms of child-on-child abuse to which the comments and measures below concerning awareness, education and reporting apply, their particular nature requires extra commentary.

Gloverspiece has an important role in developing students' understanding of what constitutes child-on-child abuse and instilling behavioural norms that minimise the risk of it taking place. With this in mind, staff should be aware of the importance of:

- Not assuming child-on-child abuse is not occurring because known cases are rare when it may in fact be that such abuse is occurring and are simply going unreported by students
- Enforcing Gloverspiece rules, which are explicit about the high standards of behaviour and courtesy that we expect
- Implementing in a consistent way its Behaviour Policy
- Being clear that sexual violence or sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Not tolerating or dismissing any form of child-on-child abuse as 'banter', 'just having a laugh' or 'boys being boys' as this can lead to a culture of unacceptable behaviours and an unsafe environment for students; and a culture that normalises abuse, leading to children being unwilling to report it
- Implementing the anti-bullying strategy

Other strategies in place to prevent the occurrence of child-on-child abuse include:

- providing developmentally appropriate PSHE lessons which develop students' understanding of acceptable behaviour. Themes covered in these lessons that are particularly relevant to child-on-child abuse include: consent, gender roles, stereotyping and equality, healthy relationships, and power imbalances in relationships
- having systems in place for any students to raise concerns with staff, knowing that that their concerns will be taken seriously and that they will be listened to, believed and valued
- delivering targeted work on assertiveness and keeping safe for those students identified as being potentially vulnerable

If a student discloses that they or another student has been the victim of child-on-child abuse, the guidance for gathering and recording the information should be followed.

If an allegation of child-on-child abuse has been made the DSL must be informed as soon as possible. Where the DSL considers that the behaviour meets the local authority threshold criteria (i.e. where there is reasonable cause to suspect a student is suffering or is likely to suffer significant harm), the case will be referred to the local authority using the procedures set out in this policy. Gloverspiece will take advice from children's social services on when and how to inform the student about the allegations and how the investigation of allegations should be conducted. It will also take all appropriate action to ensure the safety and welfare of all students involved, including those accused of abuse. Further details on how cases of child-on-child abuse will be managed is contained in Part 5 of KCSIE (September 2025).



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A student against whom an allegation of abuse has been made may be suspended during the subsequent investigation and the policies on behaviour and discipline will apply.

If it proves necessary for a student to be interviewed by the police in relation to allegations of abuse, Gloverspiece will ensure that, subject to the advice of children's social services, parents are informed as soon as possible and that an appropriate adult supports the student during the interview. If a student's parents are abroad, the student's education guardian will be asked to support the student and to accommodate him or her if they have been suspended.

Both the victim and the perpetrator will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. The DSL, as part of these procedures, will produce a welfare risk assessment which will consider the needs of all those involved (victim, perpetrator and other students at Gloverspiece and the measures that need to be taken to protect and keep them safe. When compiling the risk assessment, appropriate weight will be given to the wishes of the victim; the nature of the alleged incident; the ages of those involved; whether the incident was an isolated one or part of a pattern; any power imbalance between the victim and perpetrator; any ongoing risks to the victim and other students; and any relevant contextual factors. Children's social services will independently risk assess the situation and any report produced by them will be used to inform and update the school's own risk assessment which, in any event, will be reviewed on a regular basis.

Child-on-child sexual violence and sexual harassment

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Behaviour outside the normal range is called harmful sexual behaviour (HSB) because it is harmful to others or the student themselves. HSB can occur online and/or face-to-face. (For a table that presents key features of the continuum, please see Appendix 6.)

Central to determining whether sexual behaviour between children can be considered harmful is the age and development of those involved. For example, sexual behaviour can be considered harmful if one of the children is much older, particularly if there is more than two years' difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child if they have power over them, for example, if the older child is disabled or smaller in stature. For some there may be a link between viewing online pornography and subsequent HSB.

HSB can escalate over time. Early intervention when inappropriate behaviour is identified can help prevent problematic, abusive and/or violent behaviour in the future. It should be noted that the majority of young people displaying HSB do not become sexual offenders as adults.

Sexual harassment refers to 'unwanted conduct of a sexual nature' and can occur online and offline and both inside and outside of school. Sexual harassment can take a wide variety of forms:

- Sexual comments, such as: telling sexual stories, making lewd comments or sexualised remarks about a person's clothes or appearance, using sexualised names, sexual jokes or taunting etc



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- Physical behaviour, such as deliberately brushing against someone, interfering with clothing (flicking bra straps, lifting up skirts etc), pulling down trousers, upskirting, displaying pictures, drawings or photos of a sexual nature
- Online sexual harassment, such as non-consensual sharing of images and videos (nudes and semi-nudes), sharing unwanted explicit content, sexualised online bullying, unwanted sexualised comments and messages, sexual exploitation and coercing others into sharing images of themselves or performing acts they are not comfortable with online

Sexual violence includes acts such as sexual assault, assault by penetration, rape and causing someone to engage in sexual activity without consent (this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party). A key feature of such acts is that the sexual activity takes place without the consent of the victim. Consent can only be given if an individual has the freedom and capacity to choose to participate in a sexual act. Consent to sexual activity may be given to one sort of sexual activity but not another and can be withdrawn at any time during sexual activity.

Sexual harassment and sexual violence can occur between students of any age and sex. However, staff should be aware that some groups are at greater risks than others. Girls, pupils with SEND, and LGBTQ+ pupils are more likely to be victims of these types of abuse. Evidence shows that boys are more likely to be perpetrators and girls to be victims. Young people who are victims of sexual harassment and sexual violence will find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment.

Students may not find it easy to tell staff about their abuse verbally. They can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of staff may overhear a conversation that suggests a child has been harmed, or a child's own behaviour might indicate that something is wrong.

All staff will be trained to manage a report of child-on-child sexual violence and sexual harassment. It is essential that **all** victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual harassment or sexual violence. Nor should a victim ever be made to feel ashamed for making a report, or their experience minimised. It is also important to emphasise that the law is in place to protect children and young people rather than criminalise them.

This policy provides general guidance for listening to students and record-keeping. Effective safeguarding practice in the context of claims of sexual harassment or sexual violence further requires the following:

- If possible, reports should be managed with two members of staff present, (preferably one of them being the Designated Safeguarding Lead or a Deputy).
- Where the report includes an online element, staff should know and follow the searching, screening and confiscation advice (for schools) and UKCIS advice on sharing nudes and semi-nudes. The key consideration is for staff not to view or forward illegal



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images of a child. The UKCIS advice provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.

- The recognition that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so pupils may not be able to recall all details or timeline of abuse.

Gloverspiece will respond appropriately to all reports and concerns about sexual harassment and/or sexual violence both online and offline, including those that have happened outside of the School. The DSL/DDSLs are likely to have a complete safeguarding picture and be the most appropriate people to inform the school's initial response. Important considerations will include:

- The wishes of the victim in terms of how they want to proceed*
- The nature of the alleged incident(s), including whether a crime may have been committed and/or whether harmful sexual behaviour has been displayed
- The ages and developmental stages of the children involved
- Any power imbalance between the children (e.g. whether the alleged perpetrator(s) is/are significantly older, more mature and confident)
- Whether the victim has a disability or learning difficulty
- Whether the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- If the sexual harassment or sexual violence took place within an intimate relationship between those involved
- The risk of intra familial harms and the need for siblings to be supported following an incident
- Whether there are ongoing risks to the victim, other children, adult students or school or School staff
- Other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation

**Note: The victim of sexual harassment or violence may ask the school not to tell anyone but the DSL has to balance the victim's wishes against their duty to protect the victim and other students in the School. The general rule of thumb is that if a student is either at risk of harm, or is in immediate danger or has been harmed, a referral to local authority social care should be made. Rape, assault by penetration and sexual assaults are crimes and must therefore be reported to the police.*

The DSL will reach a judgement about which of the following four ways is the most appropriate for handling the case:

- Internal management: handled entirely within the school.
- Early help: where the students concerned do not require referral to statutory services but may benefit from assistance from an external agency.
- Local authority children's social care: where a child has been harmed, is at risk of harm, or is in immediate danger.
- Report to the police: in addition to the above, where the seriousness of the concern merits it.



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In all but the first circumstance, how the case is managed will be determined in conjunction with the local authority MASH (Multi Agency Safeguarding Hub) team and/or the police. Gloverspiece will follow the guidance as set out in detail in KSCIE (2025), Part 5.

Gloverspiece will do all that it reasonably can to protect the anonymity of students involved in any report of sexual harassment or sexual violence. Amongst other things, this will mean carefully considering which staff should know about the report and any support that will be put in place for those involved.

Risk and needs assessments are integral to the management of most cases of sexual harassment and all cases involving sexual violence. These assessments must be formulated on a case-by-case basis and should be conducted **immediately** once an incident comes to light rather than waiting for the outcome (or even the start) of a local authority children's social care and/or police investigation.

Where sexual violence is alleged to have occurred the risk and needs assessment should consider:

- The victim, especially their protection and support
- Whether there may have been other victims
- The alleged perpetrator(s)
- All other children at the School, especially any actions that are appropriate to protect them from the alleged perpetrators
- The time and location of the incident, and any action required to make the location safer

Risk assessments will be recorded in writing and kept under regular review by the DSL to ensure the risk mitigation measures that have been put in place are effective and reflect changing circumstances. It is highly likely that these risk assessments will be informed by assessments made by social workers and/or sexual violence specialists.

Where a report has been made to the police, Gloverspiece will seek their advice and agree what information can be disclosed to staff and others, in particular the alleged perpetrators and their parents or carers. Central to this discussion will be how the victim can best be protected. Thereafter the DSL will continue to work closely with the police (and any other agencies as required) and keep up to date with how any investigation is progressing. The fact that another body is investigating or has investigated an incident does not necessarily prevent the School from coming to its own conclusion, on the balance of probabilities, and imposing a sanction accordingly.

However, Gloverspiece will consider if, by taking any action, an external investigation and/or any subsequent prosecution could be compromised. There may also be circumstances in which it would be unreasonable or irrational to reach its own view about what has occurred while an independent investigation is ongoing. Gloverspiece will be guided by the police and/or local authority children's social care when making this decision.

Where allegations of sexual harassment or sexual violence are contested there can be lengthy delays before the criminal process is complete. In such circumstances, a determination will need to be made on a risk assessment basis as to whether it is viable for both the victim and alleged perpetrator to continue their education with us. Consideration will be given to: stress and trauma to the victim; the potential for the suspected person to intimate the victim or witnesses; and the need to protect the rights of the alleged perpetrator to education, privacy and family life. The decisions taken must be proportionate to the alleged offence and balance the rights of the victim and perpetrator(s) and will be guided by advice provided by children's social services and the police.



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Not all cases reported to the police are progressed and those that are may result in a not guilty verdict. The fact that an allegation was withdrawn or could not be substantiated does not necessarily mean that it was unfounded. Under these circumstances, Gloverspiece will discuss with the victim how the situation is to be managed and ongoing support will be provided to them and the alleged perpetrator(s).

Where a criminal investigation into sexual harassment or sexual violence leads to a conviction of caution, Gloverspiece will, if it has not already done so, consider what sanctions it wishes to impose in line with its behaviour policy. The sanction imposed will be proportionate to the offence and the circumstances in which it took place. Proven cases of rape and assault will constitute a serious breach of discipline and are highly likely to result in the permanent exclusion of the perpetrator(s). Where an offence justifies a lesser sanction, consideration will also be given to how best to keep the victim and perpetrator(s) a reasonable distance apart on our premises (including during before and after school-based activities) and on transport to and from school. Any arrangements will take account of the wishes of the victim and will be discussed with their parents or carers and those of the perpetrator(s). Support arrangements will be put in place for both the victim and the perpetrator(s).

Sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Where pupils have a health need arising from sexual assault or abuse, Gloverspiece will assist them in gaining access to suitable specialist support services.

If a report of sexual violence or sexual harassment is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider if disciplinary action should be taken against the pupil who made the allegation and/or whether a referral to local authority children's social care is appropriate.

Other safeguarding arrangements

Mental health

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered, or is at risk of suffering abuse, neglect or exploitation.

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

Where young people have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by raising the issue with the DSL, who may in turn contact an appropriate external agency.

Teaching students to keep themselves safe

Gloverspiece has an important role to play in preventative education to prepare students for life in modern Britain and to create a culture of zero tolerance towards behaviours such as sexism,



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misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This culture is underpinned by the school's behaviour policy and Nurture support systems.

Gloverspiece is committed to raising awareness of personal safety whenever the opportunity arises. This includes highlighting general health and safety matters in and around the school as well as in the wider world and educating pupils about specific safeguarding issues, such as staying safe online (including when they are accessing remote learning), radicalisation, grooming, child sexual exploitation, child criminal exploitation, healthy relationships, mental health, substance misuse, bullying and sexting. These issues are explored in a variety of contexts, including academic and PSHE lessons, Modern Studies lessons, assemblies, and pastoral meetings of tutor groups. Staff are also aware of the ongoing need to promote fundamental British values as a means of building resilience to the risks of radicalisation. Students are specifically taught how to identify risks and how to modify behaviour to mitigate these risks.

Gender questioning students

When supporting a gender-questioning student, Gloverspiece will take a cautious approach as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex and psychosocial needs. This will usually involve working in partnership with parents except in rare circumstances where to do so would constitute a significant risk of harm to the student.

Online safety

The widespread use of digital communications technologies, such as personal mobile devices and the internet, presents young people with a host of opportunities for learning, participation, creativity and self-expression. At the same time, it has become a significant component of many safeguarding issues, including exposure to pornography, sharing indecent images (consensually or non-consensually), child exploitation, radicalisation and sexual predation. Issues of online safety can be broadly categorised into four areas of risk:

1. **Content:** Being exposed to illegal, inappropriate or harmful online content such as spam, pornography, fake news, substance abuse, violence, misogyny, anti-Semitism, racism, radicalisation and extremism, and lifestyle sites that promote anorexia, self-harm or suicide.
2. **Contact:** Being subjected to harmful online interaction with other users. Examples include: peer-to-peer pressure, exposure to viruses and malware, anonymous online chat sites, cyber-bullying commercial advertising, personal data or identity theft, cyberstalking, and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
3. **Conduct:** Personal online behaviour that increases the likelihood of being harmed oneself or causing harm to others. Examples include: threats to health and well-being, such as gaming or social network addiction; online disclosure of personal information and ignorance of privacy settings; online bullying; making, sending and receiving explicit images (eg consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images); and illegal conduct, including hacking, plagiarism, and copyright infringement of digital media, such as music and film.



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4. **Commerce:** Risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your students or staff are at risk, please report it to the AntiPhishing Working Group (<https://apwg.org/>).

The DSL retains overall responsibility for online safety at Gloverspiece but the day-to-day operation and implementation of the on-line safety policy is delegated to the online Safety Co-ordinator, Rebecca Piesse.

It is essential that students are safeguarded from potentially harmful and inappropriate online material. As such Gloverspiece will ensure that filters and appropriate monitoring systems are in place. However, Gloverspiece will try and ensure that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

Gloverspiece recognises that some of its older pupils may have access to electronic devices that are 3G/4G/5G enabled that potentially could enable them to bypass its filters. This access means such devices could be used to bully, control or sexually harass, share indecent images, view and share pornography and other harmful content. With this in mind, Gloverspiece employs a range of strategies to promote an understanding of online risks and to discourage misuse:

- Clear policies on e-safety
- Exploring e-safety in detail via the curriculum
- Ensuring systems are in place to facilitate early disclosure of potentially harmful online incidents
- Informing students (and their parents) of the online activity that will be expected of them as members of our community the websites they will be expected to access; and how and with whom they will interact online
- Deterrence through the use of robust sanctions against those found to have abused others online

Mobile phones and cameras

Members of staff are permitted to use their own mobile phones as a means of communicating whistle on school trips. Mobile phones should not be used when supervising or teaching students except in cases of emergency or for strictly educational purposes. Images of students must not be taken or stored on any personal mobile phone.

Photographs and videos are taken of students by staff for a variety of purposes, including displays of work/activities, personal records of achievement and for the school website. Written permission is obtained when a student joins Gloverspiece and annually thereafter and this also indicates the level of consent, including where images may be used (personal records only or personal records and on the school website). The DSL will ensure that all staff are aware of the names of students who may not be photographed or where there is limited consent. Images of students on the website will not be named. Once images have been transferred from a camera or a phone onto a computer the images should be deleted from the camera immediately. Images must not under any circumstances be transmitted by staff to other individuals over the internet.

When taking photographs or recording footage, staff should have regard to the following guidance:



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- All students must be appropriately dressed
- Images that only show a single student with no surrounding context should be avoided:
 - photographs of three or four students are more likely to include the learning context
- Use photographs that represent the diversity of students participating
- Do not use images that are likely to cause distress, upset or embarrassment
- Do not use images of a student who is considered vulnerable, unless parents or a guardian have given specific written permission

The SLT will review (at least annually), stored images and delete unwanted and out-of-date material. Parents should be made aware of the need for sensitivity and respect when filming/photographing events featuring their own child or children. Staff should monitor the use of cameras at these events and ask anyone behaving inappropriately to cease filming/taking photos.

Risk assessment

The school recognises that the evaluation of risks and putting in place measures to mitigate those risks contributes to promoting the welfare and protection of pupils. Risk assessments may pertain to the whole organisation, to specific curricular or extra-curricular activities that have hazards associated with them, or to individual students or staff. The procedures for conducting, recording and monitoring risk assessments are set out in full in the Risk Assessment Policy.

Staff recruitment

Gloverspiece is committed to safer recruitment processes. Members of teaching and non-teaching staff at Gloverspiece, including part-time staff, and visiting staff such as musicians are subject to the background checks required under the Education (Independent School Standards) Regulations 2014 and in accordance with the latest version of KCSIE. For most appointments, an enhanced DBS check with 'barred list' information will be required. At least one member of any staff recruitment panel will have had Safer Recruitment training. Gloverspiece Safer Recruitment Policy contains further details about how the process of staff recruitment is conducted.

Children absent or missing from education procedures

All staff are aware that children being absent, as well as missing, from education for prolonged periods and/or on repeat occasions is a potential indicator of a range of safeguarding issues such as neglect, sexual abuse or exploitation, child criminal exploitation, mental health problems, substance abuse, travelling to conflict zones, female genital mutilation or forced marriage. Gloverspiece has clear procedures in place for following up on unexplained absences and/or persistent absences from education, where necessary, reporting to the Local Authority any student who is missing from School for more than 15 school days (continuous). The procedure includes the requirement to record any incident, the action taken and the reasons given by the student for being missing. Attendance registers are carefully monitored to identify any trends, and action will be taken in accordance with the Attendance Policy if any absence of a student gives rise to concern.

Children missing from education are children of compulsory school age who are not registered at a school and are not receiving suitable education otherwise than at school. Gloverspiece has a legal duty to inform the Local Authority if a student is to be removed from the roll at a non-standard transition point, i.e. where a compulsory school-aged pupil leaves the school before completing the School's final year. When this notification is made the following information has to be provided by



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the School: full name of the pupil; name, address and telephone number of the parent the pupil lives with; details of any new address for the child and parent; the name of the student's destination School and confirmed start date; and the basis on which the student is being removed from the School's admissions register.

The principal grounds for removal are where the student:

- Has been taken out of school by their parents and the school has received written notification from the parent that they are being educated outside the school system
- Has been taken off roll by the Local Authority following an Emergency Annual Review

*Note: In line with KCSIE 2025, it is the school's policy to hold a minimum of two emergency contacts for each pupil.

Elective home education

Where a parent expresses their intention to remove a student from the school in order for them to be home educated, we will work with the relevant local authority and other key professionals to coordinate a meeting with parents where possible, ideally before a final decision is made. This is to ensure that parents have considered what is in the best interests of their child.

On occasion, it may be necessary for Gloverspiece School to implement the provision of remote learning for particular students. Circumstances in which this may be necessary include:

- Where part-time timetables/individual attendance plans have been implemented in collaboration with parents/carers and the local authority.
- Where a student is placed under the medical education team, so as to maintain their educational engagement and progress

In some cases, students may be learning both online and in the classroom. Where remote education is implemented, this is done in accordance with the guidance set out in 'Providing remote education: guidance for schools (DfE, 19 August, 2024).

<https://www.gov.uk/government/publications/providing-remote-education-guidance-for-schools/providing-remote-education-guidance-for-schools>

The Prevent Duty

All Schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, to have "due regard" to the need to prevent people from being drawn into terrorism. This duty is known as the Prevent duty. There are four specific elements to the school's approach to meeting the statutory requirements imposed by the Prevent duty. In summary these are:

- Risk assessment – working with the Local Authority, who provide contextual information about the area, the school assesses the risk of pupils being drawn into terrorism, including extremist ideologies
- Working in partnership – liaising closely with the LSCP to ensure students requiring support are referred at a suitably early stage
- Staff training – enabling staff to identify pupils at risk of being drawn into terrorism and to challenge extremist ideas
- IT policies – to provide guidance to pupils as to how to stay safe online and set out the filtering and monitoring mechanisms in place.



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Visiting speakers

Any student or member of staff who wishes to invite a speaker to address students must provide details of the individual to the SLT in order that they may carry out a vetting procedure. The event organiser or, if the organiser is a student, a member of the SLT, will undertake a search via the internet to research the background of the individual and consider taking up references from other schools at which they have spoken at in the past. The event organiser should also consider carefully whether the views being expressed, or likely to be expressed, constitute extremist views that risk drawing people into terrorism or are shared by terrorist groups. In these circumstances the event will not be allowed to proceed.

It is not necessary to undertake a DBS check on every speaker. In cases where specific vetting checks are not prescribed by KCSIE, the visiting speaker will be accompanied at all times by a member of staff to ensure there is no unsupervised access to pupils. However, if a DBS check is deemed necessary, the appropriate details will be recorded on the SCR.

Confidentiality and information sharing

Gloverspiece will keep all child-protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. Gloverspiece will co-operate with police and children's social services to ensure that all relevant information is shared for the purposes of child-protection investigations.

Where a student who is subject to a child-protection plan is moving to another school, the DSL will ensure their child-protection file is securely transferred as soon as possible and within five days for an in-year transfer or within the first five days of the start of a new term to allow the new school to have support in place when the child arrives. This file will be transferred separately from the main student file to the DSL at the new school and confirmation of safe receipt will be obtained. The DSL should also consider if it would be appropriate to share any information with a new school in advance of a student leaving: for example, information that would allow the new school to continue supporting victims of abuse and have support in place for when the student arrives. Where allegations have been made against staff, the school will consult with the LADO and, where appropriate, with the police and social services to agree the information that should be disclosed and to whom.

Information sharing is essential in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including in relation to their education outcomes. The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. 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. Information that is relevant to safeguarding is regarded as 'special category personal data' and as such can be shared securely on a need-to-know basis. Further non-statutory guidance [Information Sharing](#) was published by the Government in May 2024. See Appendix 4.

Whistleblowing

All staff are required to report to either Headteacher any concerns about:

- Poor or unsafe safeguarding practices Gloverspiece



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- Potential failures by Gloverspiece or its staff to properly safeguard the welfare of students
- Other wrongdoing in the workplace that does not involve the safeguarding and welfare of students

If the member of staff feels unable to raise their concern with either Headteacher (or a member of the SLT) or if they believe any concern has not been dealt with, they should contact the LADO. The NSPCC whistleblowing advice line is available for staff who do not feel able to raise safeguarding concerns internally (see section 1 for contact details). Any member of staff can whistle blow without fear of detriment (retribution or disciplinary action), provided the report was made in good faith. Malicious allegations may be considered as a disciplinary offence.

Premises, security and visitors

- Gloverspiece will take all practicable steps to ensure that all buildings are as secure as circumstances permit.
- Every effort will be made to ensure that contractors who need to enter the building for all purposes relating to the repair and maintenance of the buildings, come onsite outside of operating hours. If it is necessary for a contractor to come onsite while the children are onsite, the amount of time that contractor stays at Gloverspiece will be minimised and the contractor will always be accompanied by a member of Gloverspiece staff so that they are never left alone with any children
- Contracted workers will not be allowed to approach or speak to students in any circumstances and must ensure that all equipment and working practices are in line with health and safety standards.
- All other visitors to Gloverspiece within operating hours must sign in on arrival and sign out on departure in the Visitors Book in the kitchen
- Whilst on our premises and in operating hours visitors and contractors must be supervised by a member of staff at all times
- On arrival the arrangements for safeguarding and health and safety will be outlined

Alternative provision

If Gloverspiece places a student with an alternative provider, we continue to be responsible for the safeguarding of that student and will take all reasonable steps to ensure that the placement meets the student's needs.

Monitoring this Policy

- The DSL will monitor the content and operation of this policy and present an annual report to the Proprietor.
- The DSL will monitor the operation of this policy and procedures on a day-to-day basis and will provide regular updates at Senior Leadership Team meetings.
- The Proprietor will undertake an annual review of the policy and implementation of its procedures including good co-operation with local agencies and of the efficiency with which the related duties have been discharged. The Proprietors will draw on the expertise of staff, including the DSL, when considering amendments to policies and/or arrangements related to safeguarding.



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- Any deficiencies or weaknesses in child protection and safeguarding arrangements identified at any time will be remedied without delay.

Other relevant policies

The following policies and documents should be read in conjunction with this policy:

- Anti-Bullying Policy
- Health and Safety Policy
- Attendance Policy
- Safer Recruitment Policy
- Code of Conduct for Staff (with Low-Level Concerns Annex)
- Behaviour Policy
- Online Safety Policy
- Curriculum Policy
- Relationships and Sex Education Policy



Appendix 1: Other types of abuse

Child abduction and community safety incidents: child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. The most common form of abduction is by a parent or family member and often occurs in the wake of an acrimonious separation or divorce where there is a dispute over custody arrangements. Abduction by strangers is much rarer. There are a variety of reasons why strangers abduct children, including:

- Sexual interest in the child by the offender
- Offender's desire to control, dominate, and cause harm to the child and /or a child's family
- Emotional/mental health issues
- Financial motives where the abductor intends to profit from the abduction by demanding a ransom or by trafficking the child (see sections on child sex exploitation, child criminal exploitation and modern slavery below)

Other community safety incidents in the vicinity of a School can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

Children absent and/or missing from education: All children of compulsory school age, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special needs they may have. A child going missing from education can act as a vital warning sign of a range of safeguarding possibilities. These include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation (FGM), 'honour'-based abuse or risk of forced marriage.

The school will report to the Local Authority instances of unexplainable and/or persistent absence or a student being removed from the School roll under the circumstances outlined in KCSIE. In cases where a student has a prolonged period of authorised absence for a reason such as long-term illness, Gloverspiece will be proactive in terms of providing support to both the parents and the student.

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE): Both CCE and CSE are forms of abuse that occur when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18. This may be done: (a) in exchange for something the victim needs or wants (for example, food, drugs, alcohol money or affection) and/or (b) for the financial advantage or increased status of the perpetrator or facilitator and/or (c) through violence or threat of violence. An imbalance of power is commonly associated with age difference, but it can also be due to a range of other factors including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic and other resources.

Perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. Children can be exploited by adult males



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or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation. More detailed definitions of CCE and CSE are given below:

- **CSE** occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity. CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or the threat of violence. The victim (male or female) may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. It can include both contact (penetrative and nonpenetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).
- **CCE** is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or being forced or manipulated into threatening/committing serious violence to others.
- **County lines:** "County lines" is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. If a child is suspected to be at risk or involved in county lines, a safeguarding referral should be considered (via the National Referral Mechanism) alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.
- **Children and the court system:** Children are sometimes required to give evidence either as witnesses in the criminal courts or as part of family court procedure. This can be stressful and may reflect existing conflict and difficulties in the family. Staff members should be aware that any child who is involved in the court process may be at risk of a particular safeguarding issue. The Ministry of Justice has produced age appropriate guides for children who may have to give evidence in the criminal courts.



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- **Children with family members in prison:** Children with a parent in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. National Information Centre on Children of Offenders provides information designed to support professionals working with offenders and their children to help mitigate the negative consequences for those children.
- **Cybercrime.** Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:
 - Unauthorised access to computers (illegal 'hacking')
 - Denial of Service (DoS) or Distributed Denial of Service (DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources
 - Making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence

Children with skill and an interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the Designated Safeguarding Lead (or a Deputy), should consider referring them to the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests.

- **Domestic abuse:** Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents involving physical or sexual abuse; violent or threatening behaviour; controlling or coercive behaviour, economic abuse; psychological, emotional or other abuse and includes where they see, hear or experience its effects. For the definition to apply, both parties must be aged 16 or over and personally connected. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background. Domestic violence can take place inside or outside the home.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

When young people experience domestic abuse within their own intimate relationships, this is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where



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there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators offered support.

- **Serious violence:** All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.
- **Homelessness:** Being homeless or being at risk of becoming homeless presents a real risk to a young person's welfare. The DSL and deputies are aware of contact details and referral routes into the Local housing Authority so that they can raise /progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour as well as the family being asked to leave a property. In most cases staff will be considering homelessness in the context of children who live with their families and intervention will be on that basis. on the student's circumstances.
- **Honour-based abuse (HBA).** So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBA are abuse, are illegal in the UK (regardless of the motivation) and should be handled and escalated as such.
- **FGM:** FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Victims of FGM are likely to come from a community that is known to practise FGM. Staff should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.
- All staff must be aware of the law requiring teachers to report cases to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl aged under 18. The duty to report resides with the teacher who becomes aware of the case, not the DSL, although the DSL should be informed unless the teacher has a good reason for not doing so. The report should be made orally by calling 101 within 24 hours of the issue coming to light. Failure to report a case of FGM can result in disciplinary sanctions.
- **Forced marriage:** Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to



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enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent is where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Since February 2023 it is also 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.

- **Modern slavery:** Modern slavery encompasses human trafficking and slavery, servitude, forced or compulsory labour. Exploitation can take many forms, including, sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. The [modern slavery statutory guidance](#) provides more information on how to identify and support victims.
- **Radicalisation and extremism:** “Radicalisation” refers to the process of a person legitimising support for, or use of, terrorist violence. “Terrorism” is defined as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes with or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. “Extremism” is defined in the Prevent strategy as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. Extremist views may result in terrorist activity. The use or threat of terrorist activity must be designed to influence the government or intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There are various reasons why a young person might become interested in extremism:

- A search for answers to questions about identity, faith and belonging
- A desire for ‘adventure’ and excitement
- A desire to enhance self-esteem of the individual and promote ‘street cred’
- The discovery of and identification with a charismatic individual and, through them, attraction to a group which can offer a sense of identity, a social network and support
- A sense of grievance that can be triggered by personal experiences of racism or discrimination

Gloverspiece has a legal duty to have due regard to the need to prevent people from being drawn into terrorism and this is an aspect of safeguarding. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. Schools should be safe spaces in which children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas.

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in behaviour which could indicate that they may be in need of help or protection. Young people at risk of radicalisation may display different signs or seek to hide their views. Staff should use their



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professional judgement in identifying young people who might be at risk of radicalisation and discuss their concerns with the DSL.

On the basis of this information the DSL may conclude that a referral to the Channel Programme is appropriate. Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It is run in every local authority and addresses all kinds of extremism including those related to Islamism or the extreme-right. The support provided could include assistance with education or employment, and ideological mentoring to provide vulnerable individuals with skills to protect themselves from being drawn into extremism. An individual's engagement with the programme is entirely voluntary at all stages.

Sharing nudes and semi-nudes.

The term 'sharing nudes and semi-nudes' refers to the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. It is also known by the names 'youth-produced sexual imagery' or 'sexting'. While sharing photos and videos online and via smartphones is part of daily life for many people, enabling them to share their experiences, connect with friends and record their lives, there are risks associated with the production and distribution of sexual and explicit images both in terms of the law (Protection of Children Act 1978, as amended by the Sexual Offences Act 2003) and in relation to the possible impact on a child's well-being if images are shared more widely than they originally intended.

Creating and sharing sexual photos and videos of under-18s is illegal. Also, consensual and nonconsensual sharing of nude or semi-nude images and/or videos can be an indicator that children are at risk. Consequently, a member of the DSL team should be notified as soon as possible if an incident comes to light in which a pupil under the age of 18:

- Has created and shared sexual imagery of themselves with a peer under the age of 18
- Has shared sexual imagery created by another person under the age of 18 with another person
- Is in possession of sexual imagery created by another person under the age of 18

Management of an incident.

Any direct disclosure by a pupil should be taken seriously. Students who make such disclosures are likely to be embarrassed and worried about the consequences. Typically, they will have tried to handle the problem themselves, and they will consider notifying a member of staff as a last resort. Given the potential seriousness of the situation, the DSL must be informed as soon as possible. The DSL will conduct an initial review, which will include meeting relevant staff and the pupils, to consider:

- Whether there is an immediate risk to any child or young person
- If a referral should be made to the police and/or local authority children's social care
- If it is necessary to view the image(s) in order to safeguard the pupil – **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



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- Whether immediate action should be taken to delete or remove images or videos from devices or online services or to confiscate the device used (if possible)
- Any relevant facts about the student involved which would influence the DSL's risk assessment
- Whether to inform the parents or whether involving them would put any young person at risk of harm

Viewing the Imagery.

Staff **must not** ask to see the imagery but should confiscate the device on which it is held and pass it on to the DSL. If a device is confiscated, it should be turned off and locked away securely until it is passed on to the DSL or an external agency such as the police. Staff must not intentionally view any nudes and semi-nudes unless there is a good and clear reason to do so. The decision to view any imagery should be based on the professional judgement of the DSL. Imagery should never be viewed if the act of viewing will cause significant distress or harm to those involved. The DSL must further be satisfied that it is the only way to make a decision about whether to involve other agencies, i.e. that it is necessary (i) to contact a reporting agency to have it taken down; or (ii) to support the pupil or parent in making a report; or (iii) or that is unavoidable because the student has shown it directly to a staff member or because the imagery has been found on School equipment. Along with our own Safeguarding and Child Protection procedures, the School will follow the advice given in [Sharing nudes and semi nudes: advice for education settings working with children and young people \(December 2020\)](#).

Referral.

Once the DSL has sufficient information, a decision will be taken over whether the matter should be dealt with internally or referred to local authority children's social care and/or the police. The DSL will be informed by the need to ensure the welfare and protection of the pupil. Records will be kept of the information available and the rationale for any decisions taken.

A referral will always be made to children's social care and/or the police immediately if:

- The incident involves an adult.
- If there is reason to believe that a young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent
- What you know about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- You have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self harming

Support.

It is vital that continuing support be given to the student so that they know they are not alone. Students must be advised on how to report sexual images or videos, how to get them taken down and how to delete it from their accounts. Students must also be made aware of the importance of not sharing the image further. Most online service providers offer a reporting function for account holders and some offer a public reporting function to enable a third party to make a report on behalf of the child or young person. Students can use [Childline's Report Remove tool](#) to report images and videos they are worried have been, or might be, shared publicly.



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Deletion of imagery.

If Gloverspiece decides that other agencies do not need to be involved, then consideration should be given to deleting nudes and semi-nudes from devices and online services to limit any further sharing. In most cases, pupils should be asked to delete the imagery and to confirm that they have deleted them. Any decision to search a student's device and delete imagery should be based on the professional judgement of the DSL.

Recording incidents.

All incidents relating to nudes and semi-nudes being shared need to be recorded. This includes incidents that have been referred to the police of local authority children's social care and those that have not been reported. Copies of imagery should not be taken.



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Appendix 2: Further information on signs of abuse

Physical abuse

Physical signs	Behavioural signs
<ul style="list-style-type: none"> • Unexplained bruises and welts on the face, throat, limbs, buttocks or lower back in unusual patterns/shapes suggesting use of an instrument • Unexplained burns, especially burns found on palms, soles of feet, abdomen or buttocks • Scald marks: immersion burns produce 'stocking' or 'glove' marks on feet and hands or upward splash marks, which may suggest hot water has been thrown over a child • Human bite marks • Broken bones 	<ul style="list-style-type: none"> • Behavioural extremes (withdrawal, aggression or depression) • Unbelievable or inconsistent explanations of injuries • Fear of parents being contacted • Flinching when approached or touched • Truancy or running away from home

Child sexual exploitation

Physical signs	Behavioural signs
<ul style="list-style-type: none"> • Tiredness or mood swings • Bruising • Sexually transmitted diseases • Pregnancy 	<ul style="list-style-type: none"> • Sudden decline in School performance, punctuality, attendance • In possession of expensive goods • Going to place they cannot afford • Age-inappropriate clothing • Inappropriate sexualised behaviour • Secretive • Deterioration in mental well-being • Mixing with older people • Misuse of drugs and alcohol



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Emotional abuse

Physical signs	Behavioural signs
<ul style="list-style-type: none"> ● Eating disorders, including obesity or anorexia ● Speech disorders (stammering) ● Nervous disorders (rashes, hives, facial tics, stomach aches) 	<ul style="list-style-type: none"> ● Fear of parent being approached ● Fear of making mistakes ● Developmental delay of emotional progress ● Cruel behaviour towards children, adults or animals ● Self-harm ● Behavioural extremes, e.g. listless/excitable, overly compliant/demanding, withdrawn/aggressive

Neglect

Physical signs	Behavioural signs
<ul style="list-style-type: none"> ● Height and weight significantly below age level ● Poor hygiene (lice, body odour etc) ● Inappropriate clothing for weather conditions ● Indicators of prolonged exposure to the elements (sunburn, chapped extremities, insect bites) ● Constant hunger, sometimes stealing food from others 	<ul style="list-style-type: none"> ● Erratic attendance at School ● Chronic hunger or tiredness ● Having few friends ● Assuming adult responsibilities

Sexual abuse

Physical signs	Behavioural signs
<ul style="list-style-type: none"> ● Torn, stained or bloody underclothes ● Pain or itching in genital area ● Bruises or bleeding near genital area or anus ● Sexually transmitted infections ● Pregnancy ● Discomfort when walking or sitting down 	<ul style="list-style-type: none"> ● Self-harm ● Sexual knowledge or behaviour (promiscuity) that is beyond their age/developmental level ● Sudden or unexplained changes in behaviour ● Avoiding undressing or wearing extra layers clothing ● Truancy ● Regressive behaviours (bed-wetting or fear of dark)



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Female genital mutilation

Physical signs	Behavioural signs
<ul style="list-style-type: none"> ● Difficulty walking, sitting or standing ● Bladder or menstrual problems ● Severe pain and bleeding ● Infections such as tetanus, HIV and hepatitis B and C 	<ul style="list-style-type: none"> ● Absent for a prolonged period ● Unusual behaviour after a period of absence ● May talk of a 'special procedure' or 'special occasion to become a woman' ● Spending longer periods in the bathroom ● Reluctance to undergo normal medical examinations

Child criminal exploitation and county lines

Physical signs	Behavioural signs
<ul style="list-style-type: none"> ● See sections on physical and sexual abuse ● Carrying weapons ● Have been the victim or perpetrator of serious violence (eg knife crime) ● Exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection ● Found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity; owe a 'debt bond' to their exploiters ● Have their bank accounts used to facilitate drug dealing 	<ul style="list-style-type: none"> ● Self-harming ● Persistently going absent from School or home and/or being found out of area ● Deterioration in mental well-being ● Unexplained acquisition of money, clothes or mobile phones ● Excessive receipt of texts/phone calls and/or having multiple handsets ● Relationships with controlling older individuals or groups ● Significant decline in School performance ● Gang association or isolation from peers or social networks ● Involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs



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Grooming

Physical signs	Behavioural signs
<ul style="list-style-type: none"> • See section on sexual abuse 	<ul style="list-style-type: none"> • Spending increasingly prolonged time online • Having older boyfriends or girlfriends • Secretiveness about who they are talking to online and what sites they visit • Possession of electronic devices such as mobile phones or webcams that parents have not provided • Engaging less with their usual friends • Using sexual language that you would not expect them to know • Going to unusual places to meet people • Using drugs and/or alcohol • Going missing from home or School

Forced marriage

Physical signs	Behavioural signs
<ul style="list-style-type: none"> • Cut or shaved hair as a form of punishment for being disobedient 	<ul style="list-style-type: none"> • Absence from School • Failure to return from visit to country of origin • Self-harm or attempted suicide • Running away from home • Early marriage of siblings • Sudden announcement of engagement to a stranger



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Radicalisation

Physical signs	Behavioural signs
<ul style="list-style-type: none">● Out of character changes in dress, behaviour, and peer relationships	<ul style="list-style-type: none">● Beginning to isolate themselves from family and friends● Showing sympathy for extremist causes● Glorifying violence● Legitimising the use of violence to defend ideology for a cause● Evidence of possessing illegal or extremist literature● A sudden disrespectful attitude towards others● Unwilling to engage with or being abusive to pupils who are different● Increased secretiveness, especially in relation to internet use eg changing online identity or having more than one online identity● Feeling persecuted● Embracing conspiracy theories● Unwillingness or inability to discuss their views● Increasingly judgemental or argumentative● Advocating messages similar to illegal organisations such as 'Muslims Against Crusades' or other nonproscribed extremist groups such as the English Defence League



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Broad government guidance on the following is also available via the GOV.UK website
(see Part one: Keeping children safe in education September 2025)

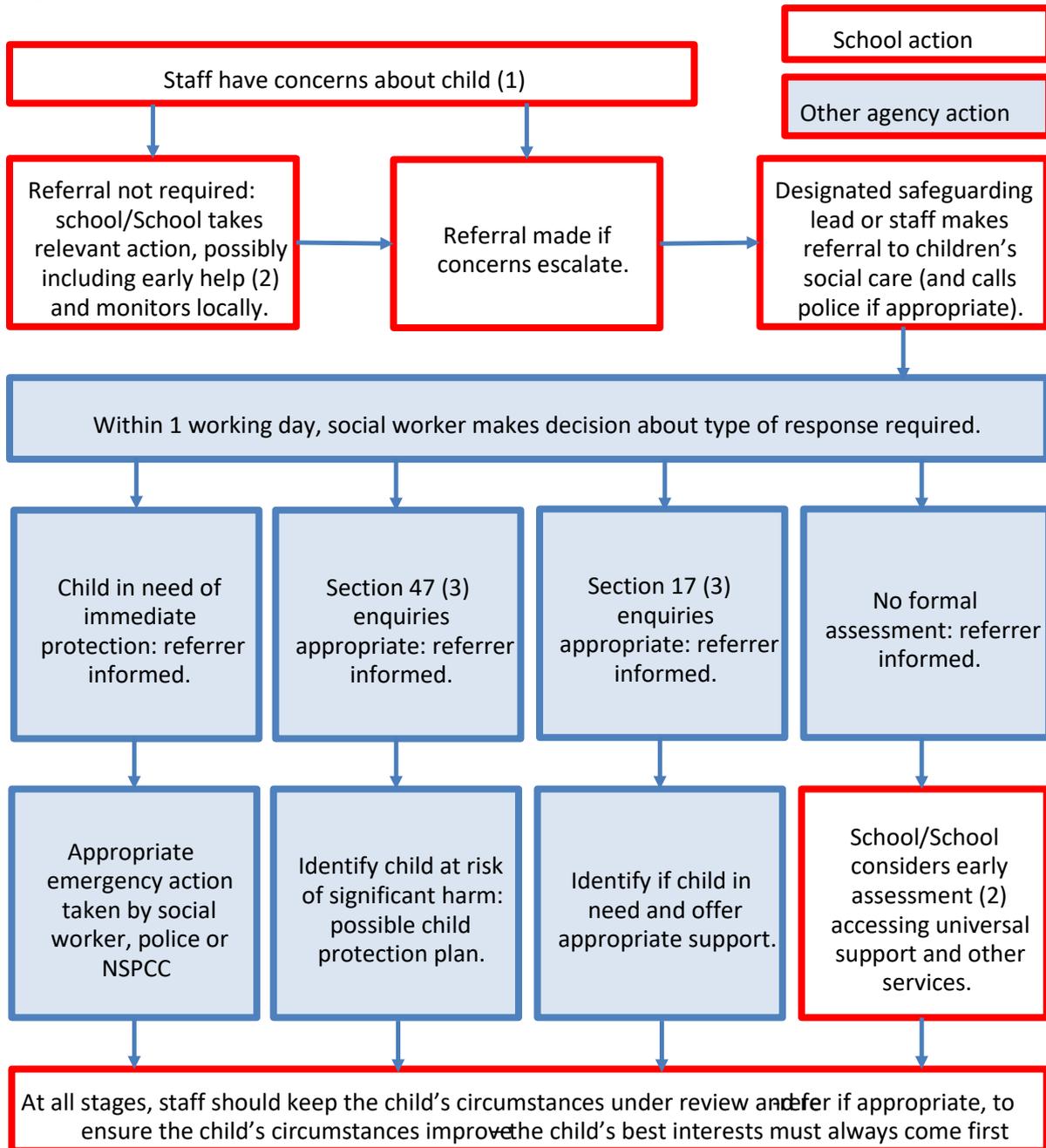
- [bullying, including cyberbullying](#)
- [children missing education](#)
- [child missing from home or care](#)
- [child sexual exploitation](#)
- [domestic violence](#)
- [drugs](#)
- [fabricated or induced illness](#)
- [faith abuse](#)
- [female genital mutilation \(FGM\)](#)
- [gangs and youth violence](#)
- [gender-based violence/violence against women and girls \(VAWG\)](#)
- [hate](#)
- [mental health](#)
- [missing children and adults](#)
- [private fostering](#)
- [preventing radicalisation](#)
- [relationship abuse](#)
- [sexting](#)
- [trafficking](#)



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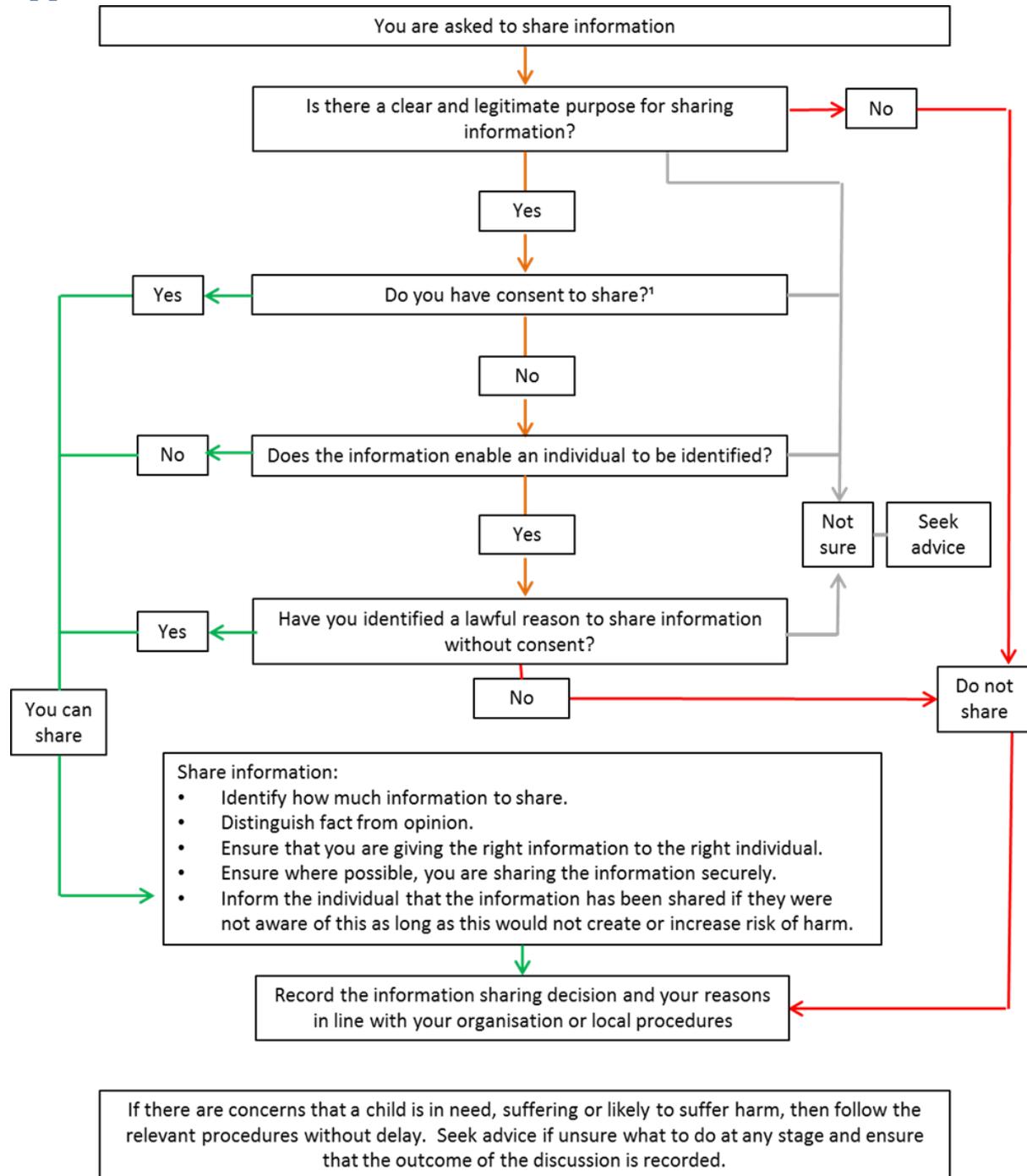
Appendix 3: Actions where there are concerns about a child (KCSIE, September 2024)



1. Cases where there is a concern or allegation made against a staff member refer to the Headteachers or LADO (see Section 15)
2. Early help involves providing support as soon as problem emerges. Where coordinated early help is required, an early help inter-agency assessment will be arranged. Referrals will follow the processes set out in Camden's threshold guidance



Appendix 4: Flowchart of when and how to share information





Appendix 5: Gloverspiece DSL Job Description Role of the Designated Safeguarding Lead (DSL)

Taken from Keeping Children Safe in Education – Annex C.

The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety). The DSL will have the appropriate status and authority within Gloverspiece to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and the DSL will be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and to contributing to the assessment of children.

The Designated safeguarding lead will be a part of the senior leadership team and contribute to the running of the organisation and the continual improvement of Gloverspiece. The DSL will lead on maintaining the Independent School Standards for Safeguarding.

Deputy designated safeguarding leads

Gloverspiece has three deputy DSLs. The Deputies will be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

Safer Recruitment

The designated safeguarding lead is responsible for maintaining the single central record for all staff at Gloverspiece. will include ensuring that all pre-employment checks have been carried out and copies are kept on file where appropriate.

Availability

During term time the designated safeguarding lead (or a deputy) should always be available during school hours, for staff to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, occasionally by phone or teams may be used as an alternative.

Manage referrals

The designated safeguarding lead is expected to refer cases of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care:

- To the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
- Where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required



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- Where a crime may have been committed to the Police as required. NPCC - When to call the police should help understand when to consider calling the police and what to expect when working with the police

Working with others

The designated safeguarding lead is expected to:

- Act as a source of support, advice and expertise for all staff
- Act as a point of contact with the safeguarding partners
- Liaise with the headteacher to inform her of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- As required, liaise with the “case manager” (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member
- Liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, senior mental health leads and special educational needs coordinators (SENCOs), or the named person with oversight for SEN in a college and Senior Mental Health Leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a 145 referral by liaising with relevant agencies so that children’s needs are considered holistically
- Liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- Work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children’s attendance, engagement and achievement at school or college. This includes:
 - To ensure that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
 - to support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children’s educational outcomes.

Information sharing and managing the child protection file

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child. Records should include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome



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They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in part one and part two of Keeping Children Safe in Education guidance. Where children leave the school (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required. Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

Raising awareness

The designated safeguarding lead should:

- Ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part-time staff
- Ensure the school's or college's child protection policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with the proprietor regarding this
- Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this
- Link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.

Training, knowledge and skills

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- Understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements



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- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- Understand the importance of the role the designated safeguarding lead has in providing information and support to children social care in order to safeguard and promote the welfare of children
- Understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- Are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers
- Understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners
- Understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college
- Can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online
- Obtain access to resources and attend any relevant or refresher training courses
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them. In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role

Providing support to staff

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- Ensure that staff are supported during the referrals processes
- Support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support

Understanding the views of children

It is important that children feel heard and understood. Therefore, designated safeguarding leads should be supported in developing knowledge and skills to:

- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them



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- Understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and sharing information

The critical importance of recording, holding, using and sharing information effectively is set out in parts one, two and five of the 'Keeping Children Safe in Education' document and therefore the designated safeguarding lead should be equipped to:

- Understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR);
- Be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping. For more information please visit: Department for Education - Keeping Children Safe in Education



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Appendix 6: Hackett's Continuum of Sexual Behaviours

Hackett (2010) has proposed a continuum model to demonstrate the range of sexual behaviours presented by children and young people, from those that are normal, to those that are highly deviant.

Normal	Inappropriate	Problematic	Abusive	Violent
Developmentally expected	Single instances of inappropriate sexual behaviour	Problematic and concerning behaviours	Victimising intent or outcome	Physically violent sexual abuse
Socially acceptable	Socially acceptable behaviour within peer group	Developmentally unusual and socially unexpected	Includes misuse of power	Highly intrusive
Consensual, mutual, reciprocal	Context for behaviour may be inappropriate	No overt elements of victimisation	Coercion and force to ensure victim compliance	Instrumental violence which is physiologically and/or sexually arousing to the perpetrator
Shared decision making	Generally consensual and reciprocal	Consent issues may be unclear	Intrusive	Sadism
		May lack reciprocity or equal power	Informed consent lacking, or not able to be freely given by victim	
		May include levels of compulsivity	May include elements of expressive violence	

Reference: Hackett, S (2010). Children, young people and sexual violence. In Barter, C and Berridge, D (eds) *Children behaving badly? Exploring peer violence between children and young people*. London: Blackwell Wiley.