

Safeguarding is EVERYONE's responsibility at GHES

<u>POLICY: Safeguarding & Child Protection Policy</u>	
Last updated:	September 2026
Date of next review:	September 2027
Member of staff responsible for the policy:	Beth Warren
Dissemination of the policy:	Management Committee, staff, website

Everyone at Gloucestershire Hospital Education Service (GHES) fully recognises their responsibility, under section 175 of the Education Act 2002, to safeguard and promote the welfare of children; and to work together with other agencies to ensure there are adequate arrangements within our school to identify, assess and support those children who may be suffering harm. We also recognise the importance of being child-centred and ensuring the best interests of the child are paramount.

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002 and in line with statutory guidance: 'Working together to safeguard children' DfE 2018, and 'Keeping Children Safe In Education' (KCSIE), DfE guidance September 2026.

This policy also incorporates procedures and guidance set out by Gloucestershire Safeguarding Children Partnership (GSCP). <https://www.gloucestershire.gov.uk/gscp>



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PART ONE - QUICK ACCESS INFORMATION

A: KEY CONTACTS – GHES SAFEGUARDING TEAM

Designated Safeguarding Lead (DSL): Beth Warren (Head of Service)

Designated lead for: SPOC (Single Point of Contact) / Looked After Children / Prevent / Encompass / CSE

beth.warren@gloucestershire.gov.uk Tel: 01242 532363 / 07388 964803

Deputy Designated Safeguarding Lead (DDSL)

sarah.evans2@gloucestershire.gov.uk Tel: 01242 532363 / 07825 691324

ruth.britten@gloucestershire.gov.uk Tel: 01242 532363 / 07789 270984

emma.stevenson@gloucestershire.gov.uk Tel: 01242 532363 / 07826 892096

david.rumsey2@gloucestershire.gov.uk Tel: 01242 532363 / 07500 065193

lauren.clark@gloucestershire.gov.uk Tel: 01242 532363 / 07920 700059

becky.cooper@gloucestershire.gov.uk Tel: 01242 532363 / 07974 751808

melanie.booth@gloucestershire.gov.uk Tel: 01242 532363 / 07917 505440

alex.curry@gloucestershire.gov.uk Tel: 01242 532363 / 07823 814996

Nikki.cox@gloucestershire.gov.uk Tel: 01242 532363 / 07899 068418

Vicky.hancocks@gloucestershire.gov.uk Tel: 01242 532363 / 07771 972210

At GRH (DDSL)

Trudi.scott@gloucestershire.gov.uk Tel: 0300 422 8394 / 07780 222755

Robyn.roberts@gloucestershire.gov.uk Tel: 0300 422 8394 / 07971 121683

GRH NHS Staff (DSL/DDSL)

SG Children Practitioner: Jaz Choula

Vulnerable Women's Office: Monday to Friday (8 -4)

Tel: 07974534196

Email: jaz.choula1@nhs.net

SG Children in Care: Emily Duckett

Beacon House: Monday, Tuesday, Friday

Tel: 07929176923

Email: emily.duckett2@nhs.net

SG Specialist Nurse: Michelle Richardson

Beacon House: Monday, Tuesday, Thursday

Tel: 07976071423

Email: michelle.richardson6@nhs.net

DSL: Clare Freebrey

Clare should only be contacted if others not available

Tel: 07787327361

Email: clare.freebrey@nhs.net

SG Specialist Nurse: Vicky Stephens

Working remotely: Monday to Friday (8-5).

Does not work on alternate Fridays.

Tel: 07741627729

Email: victoria.stephens13@nhs.net

Paediatric Senior Nursing Team

ghn-tr.paedseniornursingteam@nhs.net

Use this email that is looked at by ward managers and 2 matrons – but not for anything urgent.

B: OTHER CONTACT DETAILS

Designated lead for Child Sexual Exploitation (CSE):

beth.warren@gloucestershire.gov.uk Tel: 01242 532363 / 07391 018175

Nominated Management Committee for Safeguarding / Looked After Children / CSE / Prevent:

Meg Dawson (Vice-Chair) head@casheshgreen-pri.gloucs.sch.uk Tel: 01453 763598

Local Authority Safeguarding MASH contact numbers and emails

During Office Hours (9am to 5pm)

Telephone: 01452 426565 (option 1) Urgent Concerns

Contact email: childrenshelpdesk@gloucestershire.gov.uk

Out of Office Hours [Emergency Duty Team] (5pm to 9am) 01452 614194

Practitioner advice line: (Also known as The Front Door) 01452 426565 (option 3)

For a concern that is non-urgent that you wish to have a conversation about and next steps with a community social worker, email: mashearlyhelp@gloucestershire.gov.uk

The Role of the LADO & The Allegations Management Process

[The Role of the LADO & The Allegations Management process | Gloucestershire County Council](#)

If you believe that the incident, allegation or concern appears to meet the criteria for Allegation Management involvement, then the Allegation Management Service must be contacted immediately at:

Email: amadmin@gloucestershire.gov.uk Phone: 01452 426994



C: GHES SAFEGUARDING – RESPONSE ACTION CARD

For use by: all GHES staff

Is the child safe right now?

NO:

- do you need to call emergency services? Call 999
- is a crime taking place/ Call 999 or 101
- it does not require emergency services but they need immediate further support – immediate action is still required - phone DSL/DDSL member.

YES:

Your Response Matters

1. Listen Carefully and Remain Calm

- Allow the pupil to speak freely. **Do not interrupt**, question excessively or express shock. Maintain a **calm, supportive, non-judgmental manner**.

2. Reassure the Pupil

- Acknowledge their courage in speaking up. Clarify that you are listening and **they have done the right thing**. **Do not promise confidentiality**—explain you may need to share the information to keep them safe.

3. Avoid Leading Questions

- Do **not** ask questions that suggest an answer (“Did they hit you with...?”).
- If clarification is needed, use **open prompts** such as:
 - “Tell me what happened.”
 - “Explain that to me.”
 - “Describe how that made you feel.”

4. Report Immediately to the DSL/DSSL through phone call

5. Record the Disclosure Accurately on CPOMS

- Write down the child’s words **as closely verbatim as possible**.
- Record: Date and time, Setting/context, Exactly what was said and by whom, Your observations (e.g., emotional state)
- **Do not add personal opinions or interpretations**.

Concerned?

- Is the student safe right now?
How do you know?
- Will the student be safe when you/they leave? How do you know?
- Are people around the student safe?
How do you know?
- Answered no (or you can't confidently answer yes)?
Immediate action needed.



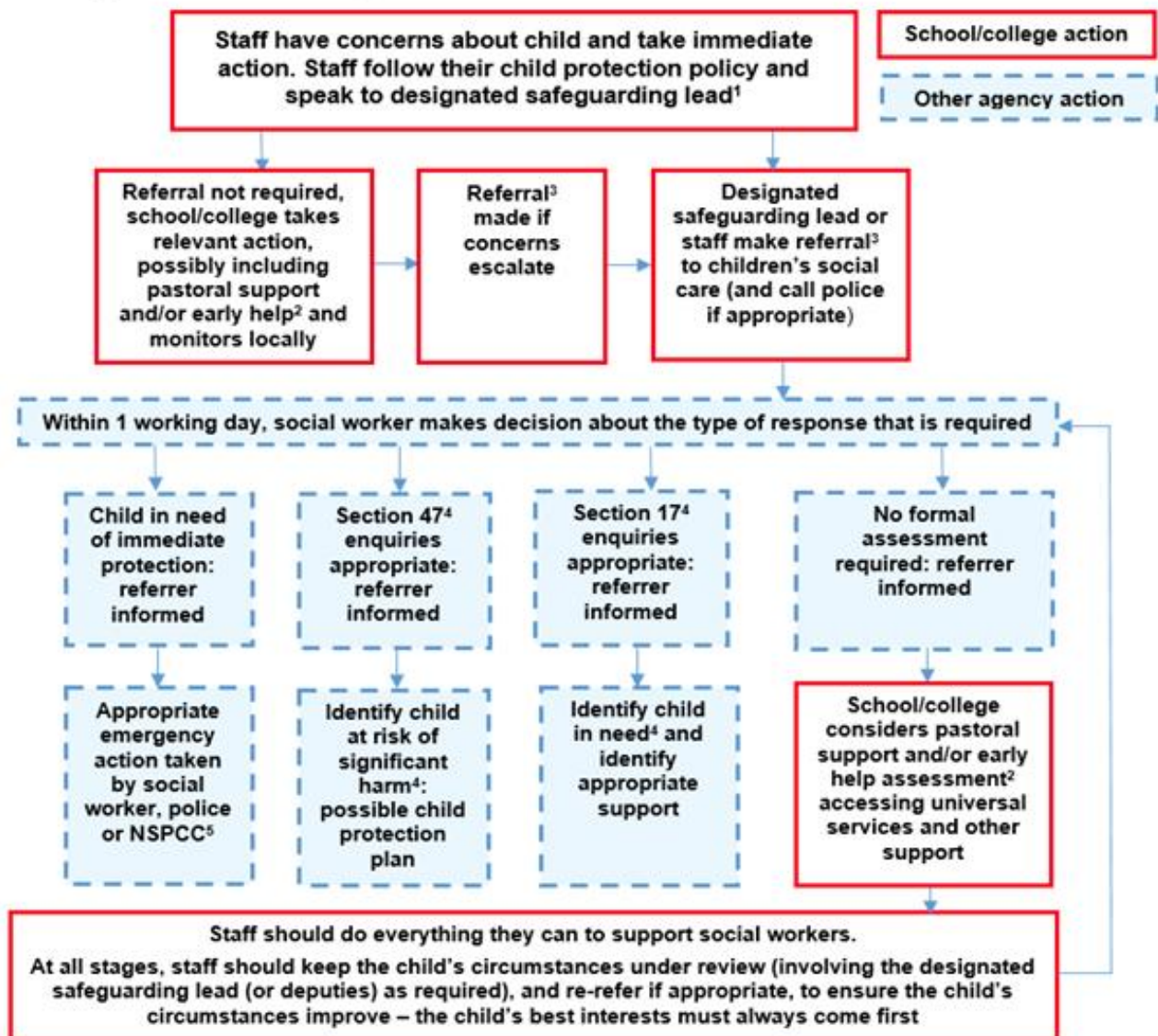
Your Response Matters

- Be Open** - remove distractions, focus, non-threatening body language and expressions.
- Slow Down** - respect pauses, don't interrupt.
- Actively Listen** - reflect back, validate their emotions, check your understanding.
- De-escalate** - stay calm, encourage regulation strategies.
- Follow Up** - duty to follow up concerns and protect from harm.
- Urgent - yes/no?



D: FLOWCHART – ACTION to TAKE

Figure 1: Flowchart setting out the actions taken where there are concerns about a child



¹ In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

² Family Help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated Family Help, a family help inter-agency assessment should be arranged. [Working Together to Safeguard Children](#) provides detailed guidance on the Family Help process.

³ Referrals should follow the process set out in the local threshold document and local protocol for assessment. See [Working Together to Safeguard Children](#).

⁴ Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under [section 17 of the Children Act 1989](#). Under [section 47 of the Children Act 1989](#), where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in [Working Together to Safeguard Children](#).

⁵ This could include applying for an Emergency Protection Order (EPO).

PART 2: SAFEGUARDING AT GHES

A: PRINCIPLES OF THIS POLICY

- **Everyone** has a responsibility to support the protection of students
- All staff will be educated in understanding the types and indicators of abuse, neglect, and exploitation, and the consequent duty of care they hold to notice any potential harm to pupils.
- All staff will adopt a child-centred approach within a whole family focus, working in partnership with parents/carers as far as possible. Staff will be empowered to act in the best interests of the pupil to protect them from harm and take appropriate actions if any concerns arise. The pupil's welfare is paramount.
- All staff will know our pupils well and offer timely support to those who have experienced, or are at risk of experiencing, an adverse childhood experience.
- All pupils will be empowered to be able to voice their opinions, and to share their thoughts and beliefs within the safe environment of the school. Pupil's wishes and feelings are sought, heard, and responded to.
- All pupils will be educated about how to manage risk, identify harmful behaviours, and seek help when needed.
- All adults who work with or for the school will have been safely recruited.
- Effective safeguarding is anti-discriminatory and anti-racist. Staff should understand and be sensitive to factors, including economic and social circumstances, ethnicity and disability, which can impact pupils and families' lives.
- All staff will know the process for accessing Early/Family Help.

B: OUR ETHOS & COMMITMENT

Safeguarding is a shared responsibility for every member of the school community. Creating a strong safeguarding culture is essential to providing the most effective environment for our pupils to thrive in all aspects of their development.

We are committed to safeguarding and promoting the welfare, physical and mental health, and safety of each pupil. We will do this by creating and maintaining an open, inclusive, caring, and supportive atmosphere where each pupil may thrive and develop physically, socially, emotionally, and academically. It is our responsibility to ensure that all pupils have equal rights to be protected from harm and abuse and the right to feel safe.

This includes:

- Proactively teaching pupils about safeguarding
- Ensuring that systems and processes are in place to protect pupils; and
- Acting in the best interests of the pupil



C: PURPOSE OF THIS POLICY

This safeguarding policy should lead to:

1. **HELP** being **PROVIDED** – to support our students and young people as soon as problems emerge
2. **PROTECTION** from **HARM** – so that our students and young people are protected from maltreatment, whether inside or outside of the home, or online.
3. **PREVENTION** of **HARM** or **FURTHER HARM** – so that our students and young people can develop in their physical and mental health without impairment.
4. **FEELING SAFE** – where our students and young people have safe and effective care.
5. **ACTION** being **TAKEN** – at the earliest opportunity to prevent concerns escalating

Part 2: **WHY** – Policy Our commitment and guiding principles to safeguarding.

Part 3: **HOW** – Process The processes required to ensure effective safeguarding in our schools. Whilst these areas provide the basis for our work, there are two other essential elements to consider: context and culture.

Part 4: **WHAT** – Knowledge The knowledge we need to know to effectively engage with our safeguarding processes.

D: ROLES AND RESPONSIBILITIES

Everyone – All Staff

All Staff are expected to provide a safe and caring environment in which children can develop the confidence to voice ideas, feelings and opinions. Children should be treated with respect within a framework of agreed and understood behaviour. Staff should be child-centred in their approach and at all times think about what is in the best interests of the child. Everyone plays a vital role in ensuring that all children are safe at GHES. It is expected that all staff, supply staff and volunteers understand and fulfil their responsibilities, and will be fully committed to the points below.

All must read on an annual basis, and adhere to:

- The GHES Child Protection Policy and Procedures (this document)
- KCSIE 2026 Part One
- Statutory Guidance: Working together to safeguard children
- Departmental advice: What to do if you are worried a child is being abused: advice for practitioners

All staff are expected to:

- be aware of the systems to support safeguarding within GHES and Gloucestershire
- be able to identify signs and symptoms of abuse
- be aware that a pupil 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



- know what to do if a pupil tells them that they are being abused, neglected, and/or exploited and/or if they are experiencing sexual harassment and/or sexual violence
- know what to do if they are concerned about the behaviour or conduct of staff in the school
- manage the requirement to maintain an appropriate level of confidentiality
- Know about Online Safety (including the filtering and monitoring systems that are in use)
- Know the expected process of referring safeguarding concerns to the GHES Safeguarding Team.
- Refer any safeguarding concern about the Headteacher to the Chair of the Management Committee
- Be aware of the local Early/Family Help process and their role in it; and identify pupils who may benefit from Early/Family Help
- Be aware of the process for making a referral to Children's Social Care and understand the role they might be expected to play in statutory assessments
- Be aware of the process of making a referral to the Police and understand the role they may be expected to play in any criminal investigation
- Be aware of the process of making a referral to Prevent and understand the role they may be expected to play in any enquiries

In addition to the above, staff must:

- consider, at all times, what is in the best interests of the child
- maintain and continue to create an environment in which all children and young people feel safe, secure, valued and respected and where they can learn and fully develop
- establish and maintain an environment where children are encouraged to talk and are listened to when they have a worry or concern. Ensure children know they can approach a trusted adult at GHES if they are worried
- ensure our children are equipped with the skills they need to keep themselves safe
- ensure all GHES staff members maintain a **culture of vigilance** and have an attitude of '**it could happen here**' where safeguarding is concerned and that when issues arise about the welfare of a child, staff members always act in the interests of the child
- establish and maintain an environment where school staff and volunteers are encouraged to share and are listened to when they have concerns about the safety and wellbeing of a child
- include opportunities in the curriculum for children to develop the skills they need to recognise and stay safe from abuse or from other areas of risk as part of a broad and balanced curriculum
- contribute to the Spiritual, Moral, Social and Cultural (SMSC) development of children as well as other key aspects of a young person's wellbeing (being healthy, staying safe, enjoying and achieving, making a positive contribution and achieving economic wellbeing).

All staff should be particularly alert to the potential need for additional support for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit

- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

Designated Safeguarding Lead (DSL)

At GHES, the Designated Safeguarding Lead (DSL) is a senior member of staff from the School Leadership Team (SLT).

The DSL takes lead responsibility for safeguarding and child protection, and this cannot be delegated. Any deputies (DDSL) must be trained to the same standard as the DSL. Activities may be delegated to DDSLs but overall lead responsibility remains with the DSL. (KCSIE Sept 2026)

The following role description has been created alongside Annex B: role of the designated safeguarding lead, KCSIE Sept 2026.

There are 4 main aspects to the DSL role, which is to:

- managing referrals to external agencies
- working with other agencies
- training, knowledge and skills
- raising awareness of safeguarding within GHES staff

Manage referrals

The designated safeguarding lead is expected to:

- know and understand the threshold for which services can be obtained in their local authority – In Gloucestershire using the 'Levels of Intervention' guidance found on Page 30 of this policy.
- refer cases of suspected abuse to the local authority Children's Social Care as required (including Early/Family Help)
- support staff who make referrals to local authority Children's Social Care (including Early/Family Help)
- 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, and
- 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

- refer pupils to external mental health agencies/signpost parents to organisations/professionals when there are concerns about a pupil's emotional wellbeing and/or mental health, in collaboration with the school Wellbeing/Mental Health Lead (s)
- follow up and escalate referrals as needed if not satisfied with the agency response, plus make re-referrals if the pupil's situation does not improve despite intervention/lack of parental engagement

Work with others

The DSL/DDSL is expected to:

- act as a point of contact with the three safeguarding partners (the LA, Integrated Care Board (ICB), and a chief officer of police from within the LA)
- be informed of 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 designated officer(s) at the local authority for child protection concerns in cases which concern a staff member
- liaise with staff (especially Pastoral staff and SENDCo, other professionals working with a pupil, main school DSL) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies
- liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health,
- act as a source of support, advice and expertise for all staff
- ensure that pupils who are victims of abuse are supported appropriately and sensitively and that all actions from planning and intervention meetings are carried out and monitored
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- attend and contribute effectively to Child In Need meetings, Child Protection conferences, planning and review meetings; including those taking place out of normal working hours
- liaise and coordinate with colleagues and outside organisations to provide Early/Family Help as soon as a problem emerges, at any point in a child or young person's life working with the Early Help Strategic Partnerships and referring to the Early Help Allocation groups where necessary. Acting as Lead Professional as appropriate
- ensure that actions resulting from meetings are SMART and that they are carried out in a co-ordinated way; making the difference which was anticipated.
- 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.

Training

The DSL & DDSLs should undergo training to provide them with the knowledge and skills required to carry out their role including multi-agency working. This training should be **updated at least every two years**. This training should be via Gloucestershire's Safeguarding Children Partnership – GSCP - in order to make local links and understand local processes, including thresholds.

This training includes

- Prevent awareness training (every three years)
- Annual online safety training

- Safer recruitment training (every two years)

In addition to the formal training set out above, 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 so that they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for local authority Children's Social Care referral arrangements and threshold documents published by the Safeguarding Partners
- 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
- ensure each member of staff has access to, and understands, this policy, especially new, part-time staff, and/or agency staff
- are alert to the specific needs of those pupils who are subject to a child in need plan, those subject to child protection plans, those who are 'looked after' or who have been 'previously looked after', those with special educational needs, and young carers
- learn how to maintain high aspirations for vulnerable pupils, promoting their educational outcomes by knowing the welfare, safeguarding and child protection issues experienced by them and the potential impact on their attendance, engagement and achievement
- understand how to support teaching staff to feel confident providing additional academic support/reasonable adjustments for vulnerable pupils who need or have needed a Social Worker, recognising the lasting impact on educational outcomes, even when statutory agencies have ceased involvement
- understand relevant data protection legislation and regulations, especially UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018
- understand the importance of information sharing, both within the school, and with the three Safeguarding Partners, other agencies, organisations, and practitioners
- are able to keep detailed, accurate, secure written records of concerns and referrals
- understand and support the school, in collaboration with the school Prevent Lead, with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting pupils 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 pupils safe whilst they are online at school, including knowledge of the school's filtering and monitoring systems and processes
- can recognise the additional risks that pupils with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support pupils with SEND to stay safe online
- can recognise the additional risks that pupils who are LGBTQ+ (or perceived to be by others) and/or are gender questioning (or perceived to be by others) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support these pupils to stay safe online
- have oversight of attendance, including those pupils who have unexplained absence, are persistently absent from education, potentially missing education, moving to be home educated, and/ or on a sponsored visa
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to pupils, having an understanding their views and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

Raise Awareness

The DSL should:

- ensure that the school's Safeguarding and Child Protection policy is known, understood, and used appropriately by staff
- ensure the school's Safeguarding and Child Protection Policy is reviewed annually (as a minimum) after the central review, the procedures and implementation are updated and reviewed regularly, and work with the proprietor/RSL regarding this
- ensure the Safeguarding and Child Protection Policy is available publicly and parents/carers are aware of the fact that referrals to Children's Social Care or the Police about suspected abuse or neglect and/or exploitation may be made and the role of the school in this
- ensure that online safety training is provided as part of regular staff updates, including updating them around the school's filtering and monitoring systems and processes 14 Safeguarding and Child Protection Policy – March 2026
- link with the local Safeguarding Partners to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements, including thresholds for service
- help promote and monitor educational outcomes of vulnerable pupils by sharing the information about the welfare, safeguarding and child protection issues that these pupils, including those with a Social Worker, are experiencing, or have experienced, with teachers and school leadership staff
- ensure that the school, and their staff, know who vulnerable pupils are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that pupils in this group might face and adjustments that they could make to best support them.

Holding and sharing information

The DSL/DDSLs 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 laws, and be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions.

This should include instances where referrals were or were not made to another agency such as LA Children's Social Care or the Prevent program etc.

Availability

During term time the DSL (or a deputy) should always be available (during school hours) for staff to discuss any safeguarding concerns. GHES has a number of trained DDSs in order that, as a peripatetic service, there is always someone available in the event that they are needed for advice or to support a member of staff.

It is the responsibility of the DSL and senior leadership team to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities. GHES ensures that there is a member of the safeguarding team available by phone out of normal school hours if an activity is taking place.

General Duties

- to undertake such other duties, training and/or hours of work as may be reasonably required and which are consistent with the general level of responsibility of this job
- to ensure that the Section 175 Audit published by Gloucestershire Safeguarding Children's Partnership (GSCP) is completed annually and returned by deadline and reviewed regularly

GHES Management Committee

GHES has a nominated safeguarding Management Committee member who takes the lead responsibility for the Management Committee and works closely with the DSL on safeguarding issues. In this case the designated person is Meg Dawson. Meg's working role is Headteacher and DSL of Cashes Green Primary School.

The responsibilities of the Management Committee in relation to safeguarding are outlined in KCSIE Sept 2026 and Ofsted Inspecting safeguarding in early years, education and skills settings.

At GHES, the Management Committee plays a crucial role in that it must ensure that GHES and the Management Committee comply with their statutory duties under legislation. They must also have regard to this policy and procedures to ensure that the policies, procedures and training at GHES are effective and comply with the law at all times.

The responsibilities placed on the Management Committee include:

- Ensure that all staff read Part One of KCSIE alongside KCSIE Annex A
- Ensure that all staff follow the requirements of this Safeguarding and Child Protection Policy
- Ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the UK GDPR (2026)
- Ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities, as set out in Part One of KCSIE
- Designate a senior board member to take leadership responsibility for safeguarding arrangements
- Ensure that all safeguarding arrangements take into account the procedures and practice of the local authority as part of the multi-agency procedures set up by the Safeguarding Partners
- Ensure that appropriate policies and procedures are in place in order for appropriate action to be taken in a timely manner to safeguard and promote pupils' welfare
- Ensure that each school works in line with local multi-agency procedures
- Ensure that the Safeguarding and Child Protection Policy is updated annually and made available via the school website
- Provide a Staff Code of Conduct and IT Policy
- Ensure that all responsibilities are followed regarding Children Absent from Education and Missing Education, using the Children Missing Education Statutory guidance (2025)) and Working Together to Improve Attendance (2024);

- Ensure that all schools follow the principles of the Prevent Duty, including the requirement to undertake an annual risk assessment
- Ensure (as far as practically possible) GHES holds more than one emergency contact number for each pupil (and advise that these are reviewed regularly by schools)
- Ensure that schools hold names addresses, and telephone contacts for all those who have Parental Responsibility for a pupil on roll
- Ensure that schools report to their local authority the removal of a pupil from the school roll in line with statutory and local authority guidance, including mid-year and those moving to be home educated
- Ensure that all schools monitor the attendance of all pupils, paying attention to those that have unexplained, persistent and/or prolonged absence; go missing from education.
- Ensure that all staff undergo safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction – this must be in line with advice from the local Safeguarding Partners
- Recognise the expertise staff build by undertaking safeguarding training and managing concerns on a daily basis
- Ensure that appropriate filters and monitoring systems are in place to keep pupils safe online and that the DfE filtering and monitoring standards are met; and consider the number of and age range of their pupils, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks
- Ensure that they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and pupils, and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies
- Ensure that pupils are taught about safeguarding, including online safety.
- Ensure that GHES operates Safer Recruitment procedures by ensuring that there is at least one person on every recruitment panel that has completed Safer Recruitment training
- Ensure that the school has procedures for dealing with allegations of abuse against staff and volunteers and to make a referral to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned
- Ensuring that the DSL and DDSs have Designated Safeguarding Lead (DSL) responsibility
- Ensure that all members of the Management Committee receive appropriate safeguarding and child protection training upon their induction and that this training is updated regularly ensuring that any weaknesses in Child Protection are remedied immediately
- Ensuring that an enhanced DBS check is in place for all Management Committee members
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements.

Pupils

At GHES, it is crucial that all pupils are protected and helped to keep themselves safe. To this end:

- all pupils have the right to be protected from abuse and neglect
- all pupils should be confident that they are listened to at all times in relation to safeguarding concerns both relating to themselves or to other children and that these concerns will be acted upon
- all pupils must feel that they can speak to any member of the GHES staff. We are largely working in pupil homes or in the hospital schoolroom and must be approachable.

- pupils who are being abused, neglected or at risk of harm will be confident to tell people whom they feel that can trust and with whom they feel safe
- all pupils should be confident that they are protected and helped to keep themselves safe from bullying, homophobic behaviour, racism, sexism and other forms of discrimination
- all pupils are taught, at an age-appropriate level, key aspects of safeguarding through the PSHE curriculum
- all children play their part in ensuring that behaviour is positive and consistent at all times.

Parents

GHES shares a purpose with parents to educate, keep children safe from harm and have their children's welfare promoted.

- everyone at GHES is committed to working with parents positively, openly and honestly
- we ensure that all parents are treated with respect, dignity and courtesy
- we respect parents' rights to privacy and confidentiality and will not share sensitive information until we have permission or it is necessary to do so to protect a child
- we will share with parents any concerns we may have about their child unless to do so may place a child at risk of harm
- we encourage parents to disclose any concerns they may have
- we make parents aware of our Safeguarding and Child Protection Policies and parents are aware that these are on the school website
- there is a commitment to work in partnership with parents or carers and in most situations it may be appropriate to discuss initial concerns with them and gain consent to request/seek support. It should be recognised that there are circumstances however, where it would be inappropriate to discuss concerns with parents or carers and may in fact put the child at greater risk. This may include identification of sexual abuse, physical abuse cases where a parent may be responsible for the abuse and parents who may not be able to respond reasonably to the situation.

E: TRAINING REQUIREMENTS

Training enables staff to fulfil their duty to safeguard pupils.

Mandatory training

Induction

Prior to any contact with pupils, all new staff must be given a mandatory induction, which includes familiarisation with child protection responsibilities and the procedures to be followed if anyone has any concerns about a pupil's safety or welfare.

As part of their induction, all new school employed staff must be provided with and have read:

- The Child Protection and Safeguarding Policy
- The Staff Code of Conduct
- KSCIE 2026: Part one and Annex A (Further Information)
- The Behaviour Policy



- Online Safety
- Appropriate child protection and safeguarding training, including online safety training
- Information about the role and identity of the DSL and deputy DSLs
- Working Together to Safeguard Children, Dec 2023
- All GCC Employee policies which includes:
 - Social media policy
 - Use of AI policy
 - Data Protection
 - Code of Conduct

The DSL and deputy DSLs will undergo child protection and safeguarding training, and update this training at least every two years. The DSL and DDSLs will also obtain access to resources and attend any relevant or refresher training courses, ensuring they keep up-to-date with any developments relevant to their role.

New staff must be informed of the names and roles of the DSL and DDSLs.
They should also be informed of the names of the Management Committee responsibilities.

All new staff and any agency/supply staff must be made aware that they are not to ever use their personal mobile phone/other personal devices when communicating with students/parents.

Annual Safeguarding Refresher

All staff at GHES must receive face to face annual safeguarding and child protection training from the DSL via the Safeguarding Refresher presentation usually at the commencement of the academic year, in addition to any other presentation/information that the DSL has prepared for the school.

Basic Safeguarding Children training

All staff employed in school must complete their online basic Safeguarding Children awareness training when they newly start work in the school as part of their induction:

MeLearning: Safeguarding in Education [Levels 1,2,3 according to role at GHES]

MeLearning; Neglect, Hidden Harm, Online Safety, Prevent, FGM

DSLs and DDSL must undertake DSL level training a minimum of every 2 years. This is through the LA through MeLearning.

In addition to the formal training set out above, the DSLs knowledge and skills should be refreshed via informal updates (this might be via e-bulletins, meeting other DSLs off/online, 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.

Safer Recruitment

All DSL/DDSL and other Post Holders with GHES must undertake training every 2 years.

Preventing Radicalisation

All school employed staff must complete online Prevent training every 3 years.

The Preventing Radicalisation Lead and DSL (only, although any staff member can access) must complete additional Prevent training via the government online sessions



Female Genital Mutilation

All school employed staff who have contact with pupils must complete online FGM training every 5 years.

Looked After Children (including Previously Looked After).

The Designated Teacher for Looked After Children for the school will undertake training every 3 years.

Online Safety

All staff who have direct contact with pupils must complete the Online Safety training – this is updated annually.

Non-Mandatory training

Updates and CPD:

All staff will also receive 'drip drip' bitesize safeguarding and child protection updates/training, including online safety training, regularly throughout the year. This is created and cascaded by DSL, DDSL and/or external specialist. This will ensure that all staff have the relevant skills and knowledge to safeguard pupils effectively. Topics covered may include information related to knowledge base documents. Format and content of any resources/presentations/training sessions can be decided by the school safeguarding team.

F: SAFER RECRUITMENT

Safer Recruitment is a vital aspect of Child Protection. GHES adheres to Gloucestershire County Council safer recruitment procedures which follows guidance from The Children's Workforce Development Council (CWDC). References are taken up before interviews and safer recruitment practice is followed in full. An online search is carried out on all shortlisted candidates prior to interview to ensure their online image is appropriate for their professional role.

In line with government guidance at least one accredited recruiter is on all interview panels and involved in the complete selection process. No member of staff or volunteer in a regulated activity will be left alone with children until the Enhanced & Barred check has been completed.

The following members of the GHES Senior Leadership Team that are accredited Safer Recruitment Trained are:

Beth Warren, David Rumsey, Sarah Evans, Karen Harris, Becky Cooper, Lauren Clark, Trudi Scott, Vicky Hancocks, Nikki Cox, Ruth Britten.

Meg Dawson (Management Committee) is also Safer Recruitment Trained.

Safer Working Practices The guidance for Safer Working Practice for Adults who work with Children and Young People in Education settings can be found on the GSCP website in the safeguarding in education section. A copy is given to all members of staff who sign to say they have read it.

G: SINGLE CENTRAL RECORD (SCR)

The school keeps an SCR which records all staff, Management Committee members, agency and third-party supply staff, and volunteers.

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK

For agency and third-party supply staff, GHES will obtain written confirmation from the employment business supplying the member of staff to state that all the necessary checks have been conducted and the date that confirmation was received.

If any checks have been conducted for volunteers, this will also be recorded on the SCR. If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded.

GHES is free to record any other information it deems relevant.

The details of an individual will be removed from the SCR once they finish working at GHES.

H: TEACHING CHILDREN ABOUT SAFEGUARDING

GHES is committed to proactively teaching pupils about safeguarding, including online safety, this is predominantly delivered through the PSHE curriculum. Pupils need knowledge and skills that will enable them to make informed and ethical decisions about their wellbeing, health and relationships. High quality, evidence-based teaching of relationships, sex and health education (RSHE) can help prepare children for the opportunities and responsibilities of adult life, and can promote their moral, social, mental and physical development. Effective teaching will support prevention of harms by helping pupils understand and identify when things are not right.

The safeguarding curriculum is taught across the school in the following way:

The school delivers the safeguarding curriculum through an approach that is age appropriate and responsive to the needs of pupils across all key stages and their own personal circumstances. Core elements are taught discretely within the PSHE programme of study, while key messages are reinforced through Link Tutor work and specific 1:1 targeted PSHE intervention. This approach provides pupils with the knowledge, skills, and understanding they need to recognise risks, seek help, and keep themselves and others safe in a range of contexts, both in and beyond school.

GHES delivers Relationships and Sex Education (RSE) through a PSHE Association–accredited programme of study where resources are adapted to meet the needs of its pupils.

The Learning Technologist informs parents/carers and pupils at induction about ways to keep safe online, and works with parents/carers directly to support them with access to devices in the home and use of mobile devices.

Parents/Carers

GHES ensures parents/carers are aware of what is being taught to pupils in RSHE when they are first referred and then on a termly basis through the GHES Weekly bulletin. GHES consults with them when developing and reviewing the RSHE Policy. It is able to provide parents/carers a representative sample of the resources that they plan to use, enabling parents/carers to continue conversations started in lessons, and should ensure that parents/carers are able to view all curriculum materials used to teach RSHE on request. Other steps may include inviting parents/carers into school to discuss the curriculum content and the importance of RSHE for wellbeing and safety, inviting them to discuss any concerns, and supporting parents/carers in managing conversations with their child (ren) about RSHE topics.

I: MULTI-AGENCY WORKING ARRANGEMENTS

GHES is committed to developing effective partnership working with relevant agencies in the best interests of children and young people. Effective multi-agency working and communication helps to safeguard young people.

GHES will be fully engaged, involved, and included in local safeguarding arrangements. Once GHES is named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies. The school will act in accordance with the safeguarding arrangements.

GHES is an Alternative Provision Provider, when a child is dual-registered, the overall safeguarding responsibility remains with the main school. However, they discharge the daily safeguarding oversight to GHES. At the point of acceptance, the main school DSL is responsible for sharing all relevant and key information with regards to the safeguarding incidents, ongoing concerns and actions to date. In the same respect GHES will inform the main school of any matters of safeguarding throughout the duration of their time they are with GHES and when they transition back to their main school or other setting.

GHES will work with CSCS, the police, health services and other services to protect the welfare of its pupils, through the Family/Early Help process and by contributing to multi-agency plans to provide additional support.

GHES also recognises the particular importance of inter-agency working in identifying and preventing CSE.

GHES has a responsibility to work with other agencies on all safeguarding issues (both current and possible in the future) which may include:

- Child abduction and community safety incidents
- Children and the court system
- Children missing from education
- Children with family members in prison
- Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)
- County lines



- Modern Slavery and the National Referral Mechanism
- Cybercrime
- Domestic abuse
- Homelessness
- So-called 'honour-based' abuse (including Female Genital Mutilation (FGM) and Forced Marriage)
- Preventing radicalisation
- The Prevent duty
- Channel
- Additional support
- Child on child abuse (including harassment and violence)
- Serious Violence

KCSIE 2026 Annex A contains important additional information about these specific forms of abuse and safeguarding issues. All staff who work directly with children at GHES have to read this annex on an annual basis.

J: INFORMATION SHARING

GHES recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet pupils' needs and identify any need for Early Help.

Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.

Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils. If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSLs.

K: ONLINE SAFETY

Introduction

At GHES the majority of core lessons will take place through online learning. Whilst this is hugely beneficial in enabling a child to access education whilst they are unwell, GHES also recognises that technology provides the platform that may facilitate harm.

All staff should be aware of the unique risks to pupils associated with online safety, and that technology is a significant component in many safeguarding and wellbeing issues, for example, the part that online use can play in grooming children and facilitating and/or causing harm. Staff should also be aware that there may be an overlap between online and offline risks of harm.

The DSL and Learning Technologist are responsible for overseeing online safety (including understanding the filtering and monitoring systems in place). They must raise awareness for staff, accordingly, including but not limited to,

filtering and monitoring systems, cyber-bullying, child sexual/criminal exploitation, radicalisation, sexually coerced exploitation, and sexual predation, including online grooming.

Areas of risk

There are 4 main areas of risk associated with technology and online safety:

- 1 **Content:** being exposed to illegal, inappropriate, or harmful material, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- 2 **Contact:** being subjected to harmful online interaction with other users for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- 3 **Conduct:** personal online behaviour that increases the likelihood of (or causes) harm for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying
- 4 **Commercial:** risks such as online gambling, inappropriate advertising, phishing, and or financial scams (including sexually coerced exploitation). If pupils, pupils or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>), CEOP and/or the IWF.

Risk assessment

Technology, and risks and harms related to it evolve and changes rapidly. GHES must carry out an annual review of their approach to online safety, supported by an annual risk assessment that considers and reflects the risks their children face (using the 360 safe website alongside the LGfL online safety audit).

Filtering and Monitoring

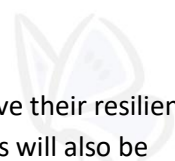
Whilst considering their responsibility to safeguard and promote the welfare of pupils and provide them with a safe online learning environment in which to learn (whatever their age and stage of development), GHES's Management Committee will be doing all that they reasonably can to limit pupil's exposure to the above risks from its own IT system.

As part of this process, GHES has appropriate filters and monitoring systems in place. These are reviewed centrally by the DSL and Learning Technologist, alongside GCC Schools IT Team to ensure that the appropriate level of security protection procedures are in place in order to safeguard their systems, staff and pupils. These teams review the effectiveness of these procedures annually to keep up with evolving cyber-crime technologies.

For a full and more detailed description of the school's filtering and monitoring systems, refer to GHES Online Safety Policy. All staff must be familiar with this.

The DSL and Learning Technologist uses the following guidance and updates:

- Cyber security standards for schools which were developed to help schools improve their resilience against cyber-attacks. The appropriateness of any filtering and monitoring systems will also be



informed in part, by the risk assessment required by the Prevent Duty (see Preventing Radicalisation and Extremism Policy).

- 'Plan technology for your school - GOV.UK to self- assess against the filtering and monitoring standards and will make any needed changes, as and when required.
- Generative AI: product safety expectations which supports schools to use generative artificial intelligence safely and explains how filtering and monitoring requirements apply to the use of generative AI in education. For a full and detailed description of our use of AI, refer to GHES's AI Policy.

Whilst it is essential GHES ensure that appropriate filters and monitoring systems are in place, it should be careful that "over blocking" does not lead to unreasonable restrictions as to what pupils can be taught with regard to online teaching and safeguarding. GHES will ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. All staff should understand their role in preventing, identifying and responding to harm caused by its use.

Many pupils have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G) whilst at home. This access means pupils may potentially sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content. GHES works closely with its parents/carers to support them to address their child's online activity as needed.

L: MOBILE PHONES

GHES operates in different environments. Pupils have lessons in their home online, where a mobile device can support learning, they come into the classroom space, and we carry out sessions within the family home or in a local community space.

GHES operates as a mobile-phone-free environment by default to ensure a safe and disruption-free learning space.

- Aims
- Minimise disruption to teaching and learning and pastoral sessions.
 - Safeguard student wellbeing.
 - Promote positive social interaction.
 - Ensure consistent expectations across GHES.
 - To support students to REACH their potential through positive behaviours
 - To prepare students to be ready to transition back to their mainstream school or other educational provision

Refer to GHES Mobile Phone policy for further details.



SECTION 3 - PROCESSES

Part One: Processes for safeguarding pupils

- A: Handling a Disclosure
- B: Confidentiality
- C: Actions following a concern or disclosure
- D: Safeguarding recording records
- E: If a child is thought to be at risk of harm – Immediate risk
- F: If a child is not at risk of immediate harm but has unmet needs
- G: When a child is suffering or is likely to suffer from harm
- H: Passing on safeguarding records when a pupil joins or leaves GHES
- I: School trips, visits and journeys
- J: Visiting professionals and speakers
- K: Support for Staff
- L: Flowchart – Action to Take
- M: Appropriate adult

Part Two: Expectations of staff conduct

- A: Low-Level concerns
- B: Self-Reports
- C: Allegations
- D: Whistleblowing

Part Three: Managing situations with pupils

- A: Managing situations involving child on child abuse
- B: Managing situations involving semi nudes/nude imagery
- C: Managing situations involving sexual violence and/or sexual harassment
- D: Managing situations involving mental health



PART ONE – PROCESSES FOR SAFEGUARDING PUPILS

A: HANDLING A DISCLOSURE

GHES SAFEGUARDING – RESPONSE ACTION CARD

For use by: all GHES staff

Is the child safe right now?

If NO:

- do you need to call emergency services? Call 999
- is a crime taking place/ Call 999 or 101
- it does not require emergency services but they need immediate further support – immediate action is still required
- phone DSL/DDSL member.

If YES:

Your Response Matters

1. Listen Carefully and Remain Calm

- Allow the pupil to speak freely. **Do not interrupt**, question excessively or express shock. Maintain a **calm, supportive, non-judgmental manner**.

2. Reassure the Pupil

- Acknowledge their courage in speaking up. Clarify that you are listening and **they have done the right thing**. **Do not promise confidentiality**—explain you may need to share the information to keep them safe.

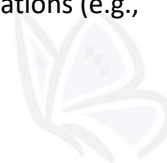
3. Avoid Leading Questions

- Do **not** ask questions that suggest an answer (“Did they hit you with...?”).
- If clarification is needed, use **open prompts** such as:
 - “Tell me what happened.”
 - “Explain that to me.”
 - “Describe how that made you feel.”

4. Report **Immediately** to the DSL/DDSL through phone call

5. Record the Disclosure Accurately on CPOMS

- Write down the child’s words **as closely verbatim as possible**.
- Record: Date and time, Setting/context, Exactly what was said and by whom, Your observations (e.g., emotional state)
- **Do not add personal opinions or interpretations.**



When a child tells me about abuse s/he has suffered, what must I remember?

- Stay calm.
- Do not communicate shock, anger or embarrassment.
- Reassure the child. Tell her/him you are pleased that s/he is speaking to you.
- Never enter into a pact of secrecy with the child. Assure her/him that you will try to help but let the child know that you will have to tell other people in order to do this. State who this will be and why.
- Tell her/him that you believe them. Children very rarely lie about abuse; but s/he may have tried to tell others and not been heard or believed.
- Tell the child that it is not her/his fault.
- Encourage the child to talk but do not ask "leading questions" or press for information.
- Listen and remember.
- Check that you have understood correctly what the child is trying to tell you.
- Praise the child for telling you. Communicate that s/he has a right to be safe and protected.
- Do not tell the child that what s/he experienced is dirty, naughty or bad.
- It is inappropriate to make any comments about the alleged offender.
- Be aware that the child may retract what s/he has told you. It is essential to record all you have heard.
- At the end of the conversation, tell the child again who you are going to tell and why that person or those people need to know.
- As soon as you can afterward, make a detailed record of the conversation using the child's own language. Include any questions you may have asked. Do not add any opinions or interpretations. NB It is not education staff's role to seek disclosures. Their role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk.

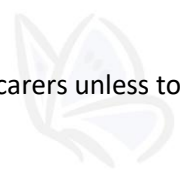
Be aware that pupils may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful. Staff will be aware that this must not prevent them from having professional curiosity and speaking to the DSL, or deputy DSL, if they have a concern about a pupil.

B: CONFIDENTIALITY

What is shared or not shared and in which circumstances:

- **all GHES staff recognise that all matters relating to child protection are confidential**
- child protection concerns and records are kept confidentially and securely, separate from the main pupil file.
- the DSL or DDSLs will only disclose information about a child to other members of staff or other professionals on a need to know basis only
- all staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children
- all staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing

We will always undertake to share our intention to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm or impede a criminal investigation.



C: ACTIONS FOLLOWING A CONCERN OR DISCLOSURE

Following a phone call from a member of staff about a concern/disclosure to a member of the Safeguarding Team, the DSL and the safeguarding team will consider the necessary course of action to support the pupil.

This could be, but is not limited to:

- Information gathering
- Information sharing (within the Safeguarding team)
- Identifying and assessing the level of need and support to address the concern
- Recording the rationale for all decisions taken
- Identifying who will inform the parents/carers of the concern, after risk assessing
- Identifying who will deliver the support to the pupil
- Recording, monitoring, and evaluating interventions for the pupil - CPOMS
- Creating Risk Assessments or updating Safe Learning Plans as appropriate
- Discuss at Safeguarding Case review meeting
- Liaising with other agencies as required

D: SAFEGUARDING RECORDS

CPOMS should be used for recording all information in relation to safeguarding. Training is given to all staff at induction on how to use and record safeguarding information.

Staff are clear that they must PHONE and SPEAK to a member of the DSL team to discuss concerns before writing up on CPOMS.

All CPOMS entries must be:

- HEADLINE: a clear sentence about nature of record
- ACTION: clear actions required
- Followed by the actual details:
 - Use bullet points
 - Be factual
 - Do not include opinion
 - All entries should be considered appropriate for parent/carer/student to read
 - Avoid description

E: IF A CHILD IS THOUGHT TO BE AT RISK OF HARM – IMMEDIATE RISK

Due to the nature of the service, lone working in family homes, lone working online - If a member of staff assesses that a criminal offence has occurred, or they/student/a parent/carer may be in imminent danger the member of staff should first contact the Police – 999.

This must be followed up with a phone call to the DSL/DDSL Team, who will complete a referral to Children's Social Care immediately.

Depending on who obtained the initial disclosure i.e. if a member of teaching staff first receives a disclosure or has a concern, the DSL/DDSL may also need to speak to the pupil, either to corroborate the pupil's account or to gain further context, prior to making any referral, to aid the authorities in their decision making.

GHES does not require parental consent for referrals to be made to statutory agencies. Consent to do this must not be obtained from the parents if to gain consent would put the pupil's safety at risk.

The GSCP website sets out all of the child protection referral processes and also all of the relevant forms. This is a live website and is regularly updated so should not be printed.

<https://www.gloucestershire.gov.uk/gscp/>

F: IF A CHILD IS NOT AT RISK OF IMMEDIATE HARM BUT HAS UNMET NEEDS

At GHES we recognise the challenges all families face and that everyone needs help at some time in their lives. This is why it is so important to us that we offer Family / Early Help at the first possible opportunity to enable us to effectively support our children and families and achieve the best possible outcomes for them. We also believe that early interventions for children or families, in many cases, will prevent children from experiencing harm, enabling us to maximise the safeguarding of all our pupils.

If there are times when families need extra help and support, we encourage them to come and talk to us. Our inclusive ethos and environment aims to promote trust between students, staff and parents/carers. As with everything we do, we do not have one set way of supporting families, we offer bespoke support, catering to the diverse needs of our students and their families.

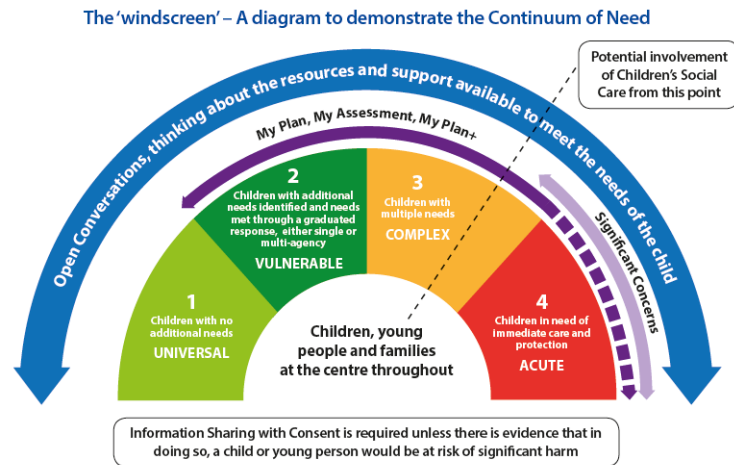
GHES Offer of Early Help statement contains everything we are able to offer to support a child who is with us. This is on the GHES website.

GSCP continuum of need windscreen/overview of levels of need (2023)

At all times all staff should consider if there is any offer of Early Help that we can make in order to help a child thrive.

The GSCP 'continuum of need' windscreen is an important diagram to keep in mind for all children. It is a diagram to show an overview of the levels of need:





Children and families may have different levels of need at different times across a range of issues. Having a graduated approach ensures that support will be appropriate.

Children might also have a range of needs at different levels. It is important to take all needs into consideration when determining the type of support that might be required and the professionals who should be involved.

Pupils with Complex or Acute Needs

Many of GHES's pupils with complex needs will have their needs met through the graduated pathway and a My Assessment & My Plan+, which is regularly reviewed through a Team Around the Child (TAC) or Team Around the Family (TAF) meeting.

Some children will have very complex needs but not be at risk of significant harm e.g. children with complex disabilities. Professionals should refer to the graduated pathway for more information.

G: WHEN A CHILD IS SUFFERING OR IS LIKELY TO SUFFER FROM HARM

A referral must be made to Children's Social Care through a MARF (Multi-Agency Referral Form). This will be completed by the DSL/DDSL alongside the Pastoral Lead or Link Tutor (whoever is most appropriate and has the immediate contact with the child).

GHES does not require parental consent for referrals to be made to statutory agencies; however, it is best practice in these situations where risk is not present for any referral to be made transparently with the parent's/carers' knowledge. GHES strives to always work alongside parent/carers to complete a referral form and identify the help and support that may be required.

H: PASSING ON SAFEGUARDING RECORDS WHEN A PUPIL JOINS OR LEAVES GHES

On acceptance of a referral to GHES the following takes place:

- Main school DSL contacted for safeguarding records or current safeguarding concerns
- A pupil check on the Vulnerable Children's Database (VCB – this is a GCC system), to identify whether the child/family are currently open to Early Help or Social Care, on a Child in Need (CIN) or Child Protection Plan (CPP) or Looked After Children or Previously Looked after. For all those who are GHES contacts the named professional for the most up to date plan, strategy or support currently in place.

Throughout the time a pupil is on roll with GHES, GHES is responsible for the day-to-day Attendance and Safeguarding of every child. We will share information with the main school when:

- The concern involves other members of their school community
- The concern involves siblings in the same school
- The pupil is starting to transition back to their main school or onward destination from GHES

On cessation with GHES, it is the responsibility of the DSL to ensure that a copy of their safeguarding records is transferred securely and confidentially to their original main school or new setting within 5 working days.

I: SCHOOL TRIPS, VISITS AND JOURNEYS

GHES has formally adopted, through its Management Committee, the Gloucestershire model policy for Offsite Visits.

Safeguarding is a critical part of all offsite visits and journeys. The Management Committee has delegated the consideration and approval of offsite visits and activities to Becky Cooper (SLT) and is therefore the Off-site Visits Co-ordinators (OVC).

Before a visit is advertised to parents, Becky Cooper (SLT) will approve the initial plan.

Staff must discuss any potential off-site visit plans with Becky Cooper on all occasions – this also includes when making plans for lessons to take place in a community space. No trips or visits will go ahead without all of the correct paperwork, procedures and arrangements being in place and approved by Becky Cooper or the Head of Service. Please refer to the [Offsite Visits Policy](#) for full details.

J: VISITING PROFESSIONALS AND SPEAKERS

Professionals

For visitors who are in school in a professional capacity, on arrival (and prior to any contact with children) schools should check their photo ID, any professional badges/lanyards, and be assured that the visitor has had the appropriate checks (or the visitor's employers have confirmed in writing that their staff have appropriate checks; and what these are). Schools should not ask to see the certificate in these circumstances.

Speakers

Whilst external organizations and individuals (including parents) can provide a varied and useful range of information and resources that can help schools enrich children's education, careful consideration must be

given to their suitability. Due Diligence must include an assessment of the education value, the age appropriateness of what is going to be delivered i.e. the content and approach, the ideology of the speaker, and whether relevant checks will be required. An online due diligence process should also be undertaken, and a discussion with the visiting speaker prior to any confirmation of booking. A record must be kept of the diligence and checks undertaken. The following form must be completed for all visiting speakers:

[GHEs Visiting Speakers Form T&Cs.docx](#)

K: SUPPORT FOR STAFF

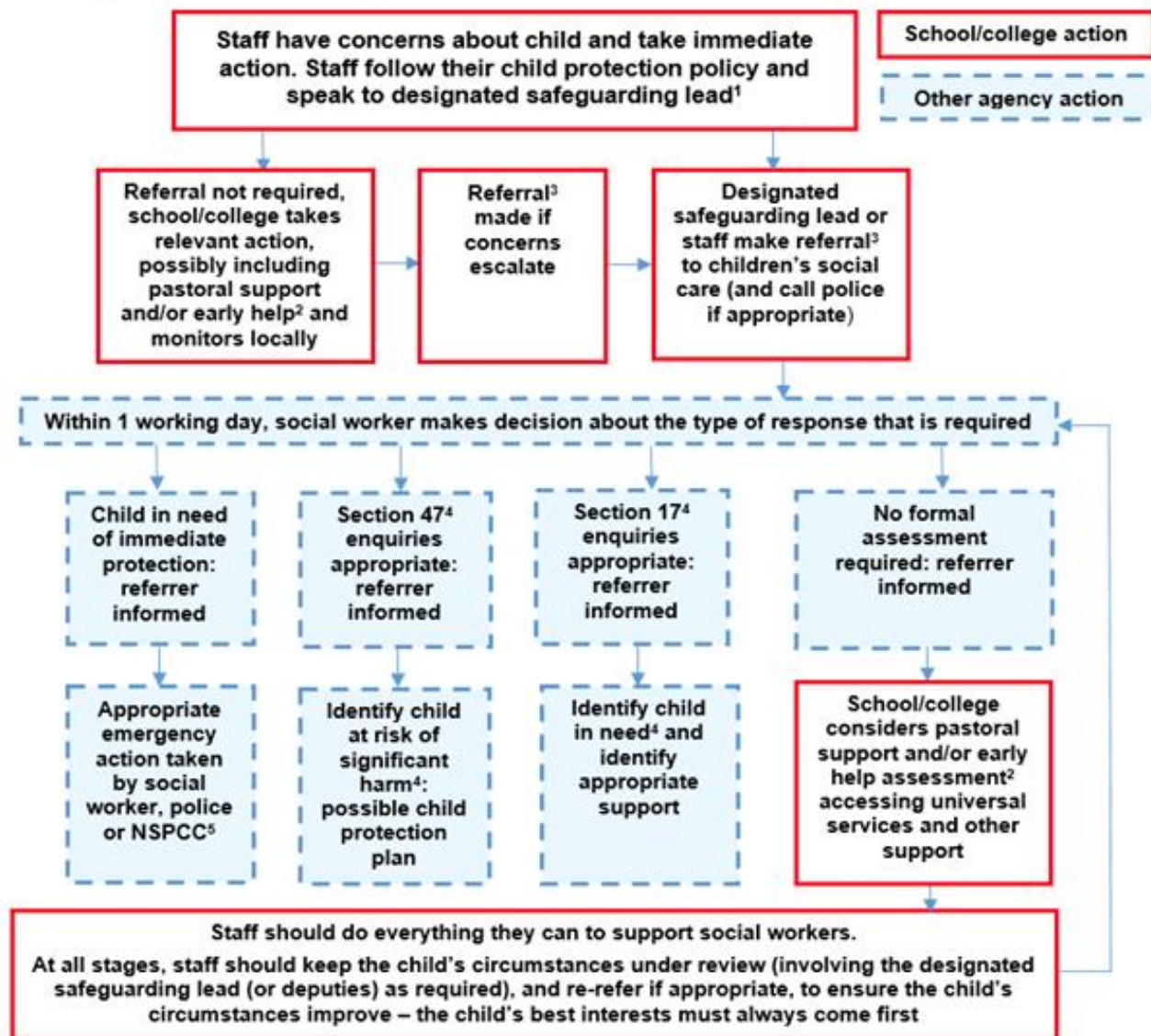
We recognise that staff working at GHES who have become involved with a child who has suffered harm or appears to be likely to suffer harm may find the situation stressful and upsetting.

We have a separate Mental Health and Wellbeing policy for staff that outlines the support and mechanisms we have in place to keep our staff wellbeing high.



L: FLOWCHART – ACTION to TAKE

Figure 1: Flowchart setting out the actions taken where there are concerns about a child



¹ In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

² Family Help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated Family Help, a family help inter-agency assessment should be arranged. [Working Together to Safeguard Children](#) provides detailed guidance on the Family Help process.

³ Referrals should follow the process set out in the local threshold document and local protocol for assessment. See [Working Together to Safeguard Children](#).

⁴ Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under [section 17 of the Children Act 1989](#). Under [section 47 of the Children Act 1989](#), where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in [Working Together to Safeguard Children](#).

⁵ This could include applying for an Emergency Protection Order (EPO).

M: APPROPRIATE ADULT

'NPCC - When to call the police' should help DSLs understand when they should consider calling the Police and what to expect when they do. Under the Police and Criminal Evidence Act (PACE) (1984) – Code C, the DSL is aware of the requirement for pupils to have an 'Appropriate Adult' when in contact with Police officers who suspect them of an offence (see below). PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for the purposes of this Code and any other Code.

PACE also states that if at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an 'Appropriate Adult' at any point. The DSL will communicate any vulnerabilities known by the school to any Police Officer who wishes to speak to a pupil about an offence they may suspect. This communication must be recorded using the school's recording systems. If, having been informed of the vulnerabilities, the DSL does not feel that the officer is acting in accordance with PACE, they should intervene in any interview, ask to speak with the officer's supervisor or contact 101 to escalate their concerns.

A person whom there are grounds to suspect of an offence must be cautioned before questioned about an offence or asked further questions if the answers they provide the grounds for suspicion, or when put to them the suspect's answers or silence, (i.e. failure or refusal to answer or answer satisfactorily) may be given in evidence to a court in a prosecution.

A Police Officer must not caution a juvenile or a vulnerable person unless the appropriate adult is present. If a child or a vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.

The 'Appropriate Adult', in the case of a child must be:

the parent, guardian or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation, a Social Worker of a local authority failing these, some other responsible adult aged 18 or over who is not:

- a Police Officer
- employed by the Police
- under the direction or control of the chief officer of a Police force; or
- a person who provides services under contractual arrangements (but without being employed by the chief officer of a Police force), to assist that force in relation to the discharge of its chief officer's functions.

Further information can be found in the Statutory guidance - PACE Code C 2019.

<https://www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible>



PART TWO – EXPECTATIONS OF STAFF CONDUCT

All staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults. Guidance about conduct and safe practice, including safe use of mobile phones by staff and volunteers will be given at induction. Ongoing training and discussion at team meetings and in supervision meeting with line-managers help to support staff.

A: LOW-LEVEL CONCERNS

What is a Low-Level Concern?

The term 'low-level concern' does not mean that it is insignificant. 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 another adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff Code of Conduct
- does not meet the threshold to be an Allegation (see below) and/or is otherwise not considered serious
- enough to consider a referral to the Designated Officer.

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

- being over friendly with pupils or having favourites
- engaging with a pupil on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate, offensive, sexualised, or intimidating behaviour / language (including shouting, being verbally aggressive, and/or saying words that could impact on their wellbeing)

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is intended to enable abuse.

What do you have to do if you have a Low-Level Concern?

Where a Low-Level Concern (including self-reports) exists, it must be reported in writing to the DSL or to the Headteacher only as soon as reasonably possible, on the same day as the incident (where the concern relates to a particular incident).

How is the Low-Level Concern dealt with?

When the DSL/Headteacher receives the report, they must inform the other in a timely fashion (within the day). There must be no delay.

The DSL/ Headteacher will discuss all low-level concerns they receive on the same day with another member of the Safeguarding team to satisfy themselves that it is a Low-Level Concern and should not be reclassified as an Allegation and dealt with under the appropriate 'allegations' procedure (outlined later in this document).

The circumstances in which a Low-Level Concern might be reclassified as an allegation are where:

- a) the threshold is met for an allegation

b) there is a pattern of low-level concerns which collectively amount to an allegation or

c) there is other information which, when considered, leads to an allegation.

If there is any doubt about the Allegations threshold, the DSL/Headteacher will seek advice from the LADO immediately. There must be no delay.

Next steps

Having established that the concern is Low Level, the DSL/Headteacher, as appropriate, will first discuss it with the individual who has raised it to gather context and any further information. The person who has raised the Low-level concern about the adult will remain anonymous.

The person to which the Low-Level Concern relates must be informed of any concern raised about them once all risk has been identified and assessed.

Most low-level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training, etc.

The DSL/Headteacher will seek advice from the GCC HR team as needed around recommendations or actions for the staff member.

Record keeping of Low-Level Concerns

Where a Low-Level Concern has been communicated a confidential record will be kept in the member of staff's personnel file. Any rationale for any decisions made and actions taken, must be recorded on the Low-Level Concern form by the Headteacher/DSL.

When staff leave the school, any record of Low-Level Concerns which are stored about them will be kept for a period of ten years and, following this, reviewed as to whether or not that information needs to be kept.

B: SELF-REPORTS

What is a Self-Report?

A Self-Report also falls under A Low-Level Concern. From time to time, an adult may find themselves in a situation which might appear compromising to others, or which could be misconstrued. Equally, they may, for whatever reason, have behaved in a manner which on reflection they consider falls below the standard set out in the Code of Conduct, falls below the expected professional standards, or breaches this policy.

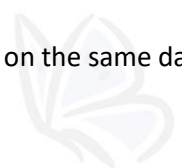
Self-Reporting by adults in these circumstances is encouraged. This demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived. As such, GHES sees Self-Reporting as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

What do you have to do if you have a Self-Report?

A Self-Report must be reported in writing to the DSL/Headteacher as soon as reasonably possible, on the same day as the incident (where the concern relates to a particular incident).

How is the Self-Report dealt with?

When the DSL/Headteacher receives the report, they must inform the other in a timely fashion (within the



day). If they are not available they should inform their direct line manager.

Record keeping

Where a Self-Report has been raised by an individual about themselves, a confidential record will be kept in their personnel file.

C: ALLEGATIONS

Allegations against adults will always be dealt with in accordance with statutory guidance provided in KCSIE 2026:

What is an allegation?

Allegations represent situations that might indicate an adult may/would pose a risk of harm to children if they continue to work in regular or close contact with children in their present position or in any capacity. This policy applies to all adults at GHES regardless of whether GHES is where the alleged incident or pattern of behaviour took place. If it is alleged that they have met one of the following four statements, often referred to as 'harm tests':

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

We understand that a pupil, parent or other professional may make an allegation against a member of staff. If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with children, the member of staff receiving the allegation or aware of the information, will immediately inform the Head of Service.

The Head of Service on all such occasions will discuss the content of the allegation with the Local Authority Designated Officer (LADO).

If the allegation made to a member of staff concerns the Head of Service, the person receiving the allegation will immediately inform the Chair of Management Committee who will consult with the LADO as above, without notifying the Head of Service first.

GHES will always follow the GSCP procedures for managing allegations against staff. Under no circumstances will we send a child home, pending such an investigation, unless this advice is given exceptionally, as a result of a consultation with the LADO. Suspension of the member of staff, excluding the Head of Service, against whom an allegation has been made, needs careful consideration, and the Head of Service will seek the advice of the LADO and HR in making this decision. In the event of an allegation against the Head of Service, the decision to suspend will be made by the Chair of Management Committee with advice from HR and LADO.

Please read the [**GHES Statement of Procedures for Dealing with Allegations of Abuse against staff for full details**](#) on **Allegations Management**.

D: WHISTLEBLOWING

All GHES staff are provided with the Code of Conduct and confidential reporting procedure (Whistleblowing Policy) for GCC employees. We all understand our duty to protect children and our responsibility to ensure unsuitable behaviour is reported and managed using the Allegations Management procedures. These can be found in the Whistleblowing Policy and on the GSCP website stated at the top of this policy.

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. If it becomes necessary to consult outside GHES, they should speak in the first instance, to the LADO following the Whistleblowing Policy.

Whistleblowing regarding the Head of Service should be made to the Chair of the Management Committee (Liz McPherson).

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk

PART THREE – MANAGING SITUATIONS WITH PUPILS

A: Managing situations involving child-on-child abuse

In some situations, a pupil will make a direct disclosure of child-on-child abuse, or their peers may report something has occurred. Alternatively, a staff member may raise a concern having witnessed or been told about an incident by a pupil or a parent/carers.

Staff

If a member of staff thinks for whatever reason that a pupil (s) may be at risk of abuse/exploitation from another pupil or young person, or a group of perpetrators, or that a pupil (s) may be abusing/exploiting others, the member of staff should report their concern verbally to the DSL without delay in accordance with this policy, recording their concern in writing after this.

Parents/carers

Parents/carers must be informed of all situations and referrals, unless to do so would heighten risk to the pupil/others.

Safeguarding Leads

The DSL will discuss the behaviour with the member of staff raising the concern and will in all situations, take any immediate steps to ensure the safety of the victim(s) or any other pupil (s) including the perpetrator (s). Where the DSL considers or suspects that the behaviour might constitute abuse and/or exploitation, Children's Social Care should be contacted immediately, and if a criminal act is thought to have occurred, also the Police. Any response should be decided in conjunction with Children's Social Care and other relevant agencies who will direct and advise

once a referral has been received and accepted and should investigate the incident and the wider context and assess and mitigate the risk posed by the perpetrator(s) to the victim(s) and to other pupils.

Take steps to ensure the safety and wellbeing of any pupils affected

1. Whilst GHES establishes the facts of the case and starts the process of liaising with Children's Social Care and the Police, the alleged perpetrator(s) should be removed from any sessions they share with the victim.
2. GHES should also carefully consider how best to keep the victim and alleged perpetrator(s) apart.
3. GHES should consider that the abuse may indicate wider safeguarding concerns for any of the pupils involved
4. Treat all pupils (whether perpetrator or victim) as being at risk - while the perpetrator may pose a significant risk of harm to other pupils, they may also have considerable unmet needs and be at risk of harm themselves.
5. Take into account the complexity of child-on-child abuse and of pupil's experiences and consider the interplay between power, choice and consent. While pupils may appear to be making choices, if those choices are limited, they are not consenting
6. Take appropriate action in respect of the perpetrator (s) – any action should address the abuse, the causes of it, attitudes underlying it and the support that may be needed if the perpetrator is at risk.

Factors to consider include the risk the perpetrator(s) poses and will continue to pose to other pupils, their own unmet needs, the severity of the abuse and the causes of it.

Safeguarding Risk Assessments

A written Safeguarding Risk Assessment must be completed after the above initial practical steps are completed. This must be shared and co-constructed with the pupils involved, their parents/carers and the safeguarding team. Any risk assessment must be regularly reviewed.

The risk and needs assessment (including for a report of sexual harassment and sexual violence) must consider for each pupil involved, whatever their role (victim/perpetrator):

- the victim, their individual needs, their protection and support
- whether there may have been other victims and/or perpetrators
- the alleged perpetrator(s) individual needs, their protection and support
- all the other pupils who have not been directly involved but who may be at potential risk, (and, if appropriate, staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms, and
- the time and location of the incident, and any action required to make the location safer (see below)

Following the incident

Perpetrator(s)

When any investigation has been completed, disciplinary action i.e. sanctions, in line with the Positive Relationships Policy may be appropriate, including

- (a) to ensure that the perpetrator takes responsibility for and realises the seriousness of their behaviour
- (b) to demonstrate to the perpetrator and others that abuse can never be tolerated; and

(c) to ensure the safety and wellbeing of the victim and other pupils in the school.

Permanent exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the victim(s) and other pupils in the school;

Victim

Provide on-going support to victim(s), including, but not limited to:

- (a) ensuring their immediate safety
- (b) responding promptly and appropriately to the abuse
- (c) assessing and addressing any unmet needs
- (d) following the procedures set out in this Safeguarding and Child Protection Policy (including where the pupil is in need of early help or statutory intervention)
- (e) monitoring the pupil's wellbeing closely and ensuring that they receive on-going support from all relevant staff members within the school
- (f) engaging with the pupil's parents/carers and any external agencies to ensure that the pupil's needs are met in the long-term

School community

GHES should consider the lessons that can be learnt from the abuse and put in place measures to reduce the risk of such abuse recurring. This may include, for example: gender and equalities work, work around school safety, security and supervision, awareness raising for staff, pupils and parents/carers about a particular form of abuse, training for staff on handling certain types of incidents or abuse.

B: Managing pupil situations involving the sharing of nudes/semi-nude imagery/videos

Where the report includes an online element, staff should be aware of searching, screening and confiscation advice (for schools) (and the Use of Reasonable Force etc Policy) and UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people.

Staff must NEVER view or forward illegal images of a child/pupil. Should they receive such, then they should notify the DSL/Headteacher immediately. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the Police for inspection and subsequent removal. This will be the decision of the Police.

When an incident involving comes to a member of staff's attention:

- The incident should be referred to the DSL as soon as possible
- The DSL will follow the best practice procedures and guidance set out in this policy
- Parents/carers of each pupil should be informed at an early stage and involved in the process (including any interviews with their child) unless there is good reason to believe that involving parents/carers would put the pupil at greater risk of harm and jeopardise any Police/Social Care enquiries
- At any point in the process, if there is a concern that a pupil (s) has been significantly harmed or is at

risk of significant harm, a referral must be made to Children's Social Care and/or the Police immediately. In these situations, the parents/carers must be informed, unless to do so may heighten any risk to the pupil/others.

C: Managing situations involving sexual violence and/or sexual harassment

All staff must be trained to manage a disclosure from a pupil around sexual violence and/or sexual harassment. They should seek advice and support from the DSL/Headteacher following any initial disclosure. Any response to sexual harassment and/or sexual violence should fall within, and be consistent with, the school's wider approach to child-on-child abuse (see above) whether the concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside of the school premises, and/or online.

It may be appropriate to make notes during the discussion with any victim involved (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the pupil and not appear distracted by the note-taking. Either way, it is essential a written record is made eventually (after immediate actions are taken) only recording the facts as the pupil presents them. Schools should be aware that notes of such reports could become part of a statutory assessment by Children's Social Care and/or part of a criminal investigation by the Police.

The basic safeguarding principles in terms of actions are:

- if a pupil discloses that they have been harmed, a referral must be made to Children's Social Care
- if a pupil says something that could indicate they may be at imminent risk of harm, Children's Social Care must be contacted immediately but also the Police
- rape, assault by penetration and sexual assaults, and upskirting are all crimes and must be reported to the Police immediately, followed by Children's Social Care
- if a pupil expresses that they are feeling unwell or have an injury due to what has occurred to them, they should receive medical assistance. However, all staff must be mindful not to remove any forensic evidence (for sexual violence i.e. criminal acts, seek advice from the authorities prior to intervention)
- parents/carers of the victim must and will normally be informed of their child's disclosure and subsequent referrals to external agencies (unless this would put the victim at greater risk).
- the school should not speak to the alleged perpetrator (or their parents/carers) in some situations
- unless the authorities have stated that this is allowed- to interview a perpetrator where criminal offences may have occurred may jeopardise their enquiries

There are four likely scenarios that schools will need to manage:

1 Internally:

For example, for one-off incidents of sexual harassment (depending on what has occurred, and whether there have been any previous incidents), GHES may take the view that the pupils concerned are not in need of early help nor that referrals need to be made to statutory services and that it would be appropriate to handle the incident internally, perhaps through utilising the Positive Relationships Policy, by providing pastoral support or putting in place 1:1 PSHE intervention. Whatever the response, it should be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable and will not be tolerated. All concerns, discussions, decisions, and reasons for decisions, including why certain decisions have not been made must be recorded on CPOMS.

2 Those requiring Early Intervention:

In line with the above, GHES may decide that the pupils involved do not require referral to statutory services but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent Harmful Sexual Behaviours (HSB) and may prevent escalation of sexual violence. All concerns, discussions, decisions, and reasons for decisions, including why certain decisions have not been made must be recorded on CPOMS.

3 Those where Social Care will need to be informed and involved:

Where a pupil has been harmed, is at risk of harm, or is in immediate danger, but a criminal offence may not have been committed, the DSL/DDSL must make a referral to Children's Social Care. At the point of referral GHES will generally inform parents/carers, unless there are compelling reasons not to (if informing a parent/carer is going to put the pupil at additional risk). Any such decision should be made with the support of Children's Social Care. If a referral is made, Social Care will then make enquiries to determine whether any of the pupils involved are in need of protection or other services. GHES should not wait for the outcome (or even the start) of a Social Care investigation before protecting the victim and other pupils in the school community. All concerns, discussions, decisions, and reasons for decisions, including why certain decisions have not been made must be recorded on CPOMS.

4 Those where a criminal offence is likely to have occurred and the Police will be needed:

The DSL/DDSL will lead GHES's response to any incident where there is evidence that a criminal offence has occurred or is likely to occur. However, GHES is not alone in dealing with sexual violence and sexual harassment. The Police will be important partner where it is thought that a crime might have been committed. Referrals to the Police will often be a natural progression of making a referral to Social Care and will generally run in parallel. All concerns, discussions, decisions, and reasons for decisions, including why certain decisions have not been made must be recorded on CPOMS.

It is important for the DSL to explain to any pupil involved that the law is in place to protect all children and young people rather than criminalise them, and this should be explained in a way that avoids alarming or distressing them. Ultimately, the DSL/DDSL will need to balance the victim's wishes against their duty to protect the victim and other pupils. The victim may ask GHES not to tell anyone about the sexual violence or sexual harassment. If the DSL/DDSL decide to go ahead and make a referral to Children's Social Care and/or a report to the Police against the victim's wishes, this should be handled extremely carefully. There are no easy or definitive answers when a victim makes this request. The reasons should be explained to the victim and appropriate specialist support should be offered.

However, where a report of rape, assault by penetration or sexual assault is made, or upskirting, the starting point is that this must be passed on to the Police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator(s) is under ten, the starting principle of reporting to the Police remains.

Informing parents/carers

GHES will generally inform parents/carers unless there are compelling reasons not to, for example, if informing a parent/carer is likely to put a pupil at additional risk. In circumstances where parents/ carers have not been informed, it will be especially important that GHES is supporting the pupil in any decision they take. This should be with the support of Children's Social Care and any appropriate specialist agencies. The school must record all their actions clearly and advice taken from external agencies.

Confidentiality

GHEs must do all they reasonably can to protect the anonymity of any pupils involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the pupils involved.

Support and sanction for the perpetrator

Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time. Our approach will be to implement preventative and/or forward looking action to safeguard the victim.

It may also be that the perpetrator requires safeguarding, especially where there are concerns that a perpetrator themselves may have been a victim of abuse. It is important that the perpetrator(s) is/are also given the correct support to try to stop them from re-offending and to address any underlying trauma that may be causing this behaviour. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

GHEs may sanction any pupil whose conduct falls below the standard which could be reasonably expected of them, and disciplinary action may be taken whilst other investigations by the Police and/or local authority Children's Social Care are ongoing. The fact that another body is investigating or has investigated an incident does not in itself prevent GHEs from coming to its own conclusion, on the balance of probabilities, about what happened, and imposing a penalty accordingly. This is a matter for GHEs and will be carefully considered on a case-by-case basis.

The basic safeguarding principle is:

- if a pupil is at risk of harm, is in immediate danger, or has been harmed, a referral must be made to child protection agencies, and
- rape, assault by penetration and sexual assaults, and upskirting are crimes and must be reported to the Police.

Parents/ carers must and will normally be informed of their child's disclosure and subsequent referrals to external agencies (unless this would put the victim at greater risk).

D: Managing situations involving mental health

At GHEs, approximately 70% of pupil referrals are for poor mental health. 50% of those referrals will come from a CAMHS care coordinator the child is receiving treatment from, the other 50% will be for poor mental health that doesn't meet the CAMHS threshold. Typically GHEs will see on those referrals references to: low mood, anxiety, depression, self-harm, absconding, medium/high risk to life, suicidal ideation, attempts to take own life (this is not an exhaustive list).

At point of referral GHEs work with the pupil, parent/carers, main school, other professionals working with the child/family to understand presenting needs, risks, and strategies/support that may already be in place, and to identify strategies/support that are still required (or waiting to be put in place).

All students undergo a risk assessment for working in the home, coming to the classroom spaces, attending sessions in the community to ensure triggers and signs to look for are captured, along with supportive strategies and actions to de-escalate or minimise risk are put in place. All students attending GHEs classroom spaces will have an induction which will involve putting in place a Safe Learning Plan – this is created alongside the pupil and parent/carer.

All staff share responsibility for promoting emotional wellbeing, identifying concerns early, recording and reporting safeguarding concerns and ensuring timely access to appropriate support. GHES will work collaboratively with families, mainstream schools, CAMHS and other professionals to safeguard pupils and support successful engagement with education.

Mental health needs may present through changes in behaviour, attendance, engagement in learning, relationships, self-regulation, physical symptoms, self-harm, risk-taking behaviours or withdrawal.

Whilst GHES staff play a vital role in promoting wellbeing, supporting students and identifying concerns, they do not diagnose mental health conditions. Where concerns are identified, staff will seek appropriate advice and support from parents/carers, health professionals and external agencies.

Graduated Response to Mental Health Needs

GHES adopts a graduated response to mental health concerns, recognising that different levels of need require different levels of intervention and support.

Level 1: Universal Support

All students will have access to:

- A safe, predictable and trauma-informed environment.
- Positive and trusting relationships with staff.
- Opportunities to develop resilience, emotional literacy and self-regulation skills.
- Access to pastoral support through an allocated Link Tutor

Level 2: Additional Mental Health Support

Where concerns emerge that are impacting a student's wellbeing, learning or behaviour, additional support may include:

- Increased pastoral support.
- Regular wellbeing check-ins.
- Individual mentoring.
- Targeted interventions.
- Risk assessment where appropriate.
- Multi-agency planning meetings.
- Consultation with parents/carers.
- Signposting to community and voluntary sector services.

Level 3: Significant Mental Health Needs

Where a student presents with more significant or persistent mental health difficulties, GHES will work collaboratively with families and relevant professionals to coordinate support. This may include:

- Child and Adolescent Mental Health Services (CAMHS) involvement.
- Educational Psychology support.
- Specialist therapeutic services.
- Social care involvement where appropriate.
- Team Around the Child (TAC) or similar multi-agency arrangements.
- Enhanced risk management planning.

The DSL will be informed of significant mental health needs where there is a safeguarding implication or heightened level of risk.



Self-Harm and Suicidal Ideation

GHES recognises that self-harm and thoughts of suicide are indicators of significant distress and must always be taken seriously.

Any disclosure, suspicion or concern relating to:

- Self-harm,
- Suicidal thoughts,
- Suicide plans,
- Suicide attempts, or
- High-risk behaviours,

will be treated as a safeguarding concern.

The DSL/DDSL will assess risk, contact parents/carers where appropriate, seek advice from relevant health professionals and, where necessary, arrange urgent or emergency intervention.

Where a pupil is believed to be at immediate risk of serious harm to themselves, emergency services will be contacted and the pupil will remain supervised by appropriate adults until support arrives if in the classroom space or confirmation their parent/carer can keep them safe until the emergency services arrive.

Mental Health and Safeguarding

GHES recognises that mental health difficulties can be both a consequence and an indicator of abuse, neglect, exploitation, trauma or adverse childhood experiences.

When staff identify mental health concerns, they will consider whether these may be linked to:

- Neglect.
- Physical abuse.
- Emotional abuse.
- Domestic abuse.
- Child sexual abuse.
- Child criminal exploitation.
- Child sexual exploitation.
- Online harm.
- Family breakdown.
- Bereavement or loss.
- Other traumatic experiences.

Where a mental health concern is also a safeguarding concern, safeguarding procedures will take precedence and concerns will be referred to the DSL/DDSL without delay.



SECTION 4 - KNOWLEDGE BASE

A: DEFINITIONS

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment
- 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
- Taking action to enable all children to have the best outcomes.

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

Children includes everyone under the age of 18.

Consent is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity, and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

B: SAFEGUARDING SPECIFIC VULNERABLE GROUPS

Any child at GHES may benefit from support before statutory intervention, including universal services and community-based Early Help, of the targeted early help level of Family help. Staff should be particularly alert to the potential need for additional support for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation • is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

GHES recognises that some groups of pupils can face additional safeguarding challenges and understands that further barriers may exist when determining abuse and neglect in these groups of pupils. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outlined below.

Pupils who need social workers

Pupils may need social workers due to safeguarding or welfare needs. These needs can leave pupils vulnerable to further harm and educational disadvantage.

As a matter of routine, the DSL will hold and use information from the LA about whether a pupil has a social worker in order to make decisions in the best interests of the pupil's safety, welfare, and educational outcomes.

Where a pupil needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare, e.g. considering the provision, pastoral or academic support.

Home-educated children (EHE)

Parents may choose Elective Home Education (EHE) for their children. In some cases, EHE can mean that children are less visible to the services needed to safeguard and support them.

In line with the Education (Pupil Registration) (England) Regulations 2006, the school will inform the LA of all deletions from the admissions register when a pupil is taken off roll and/or when a referral is received for a child that is being EHE.

Where a parent has expressed their intention to remove a pupil from school for EHE, the school, in collaboration with the LA and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the pupil has SEND, is vulnerable, and/or has a social worker.

Looked After Children and Previously Looked After Children (PLAC)

Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. PLAC, also known as care leavers, can also remain vulnerable after leaving care.

The governing board will ensure that staff have the skills, knowledge and understanding to keep LAC and PLAC safe. This includes ensuring that the appropriate staff have the information they need, such as:

- looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order
- contact arrangements with parents or those with parental responsibility
- care arrangements and the levels of authority delegated to the carer by the authority looking after the pupil.

The DSL will be provided with the necessary details of pupils' social workers and the VSH, and, for PLAC, personal advisers.

Pupils with SEND

When managing safeguarding in relation to pupils with SEND, staff will be aware of the following:

- certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's disability without further exploration; however, it should never be assumed that a pupil's indicators relate only to their disability

- pupils with SEND can be disproportionately impacted by issues such as bullying, without outwardly showing any signs
- communication barriers may exist, as well as difficulties in overcoming these barriers.

When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue relating to a pupil with SEND, the DSL will liaise with the school's SENCO, as well as the pupil's parents where appropriate, to ensure that the pupil's needs are met effectively.

LGBTQ+ pupils

The fact that a pupil may be LGBTQ+ or gender questioning is not in itself an inherent risk factor for harm; however, staff will be aware that LGBTQ+ pupils can be targeted by other individuals. Staff will also be aware that, in some cases, a pupil who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as pupils who identify as LGBTQ+.

Staff will also be aware that the risks to these pupils can be compounded when they do not have a trusted adult with whom they can speak openly with. Staff will endeavour to reduce the additional barriers faced by these pupils and provide a safe space for them to speak out and share any concerns they have.

Pupils requiring mental health support

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

C: INDICATORS OF ABUSE and NEGLECT

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including what 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.

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying), causing

children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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 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 in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

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, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

All staff will be aware of the indicators of abuse and neglect and understand that children can be at risk of harm inside and outside of the school, inside and outside of home, and online. All staff will be aware that abuse, neglect and other safeguarding issues are rarely standalone events that can be given a specific label, and multiple issues often overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL. All staff, especially the DSL and deputy DSLs, will be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments; this includes being aware that pupils can be at risk of abuse or exploitation in situations outside their families (extra-familial harms). All staff will be aware of the appropriate action to take following a pupil being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

D: SPECIFIC FORMS OF ABUSE AND SAFEGUARDING ISSUES

KCSIE 2026 Annex B contains important additional information about these specific forms of abuse and safeguarding issues. All staff who work directly with children at GHES have to read this annex on an annual basis.

- Child abduction and community safety incidents
- Children and the court system
- Children missing from education
- Children with family members in prison
- Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)
- County lines
- Modern Slavery and the National Referral Mechanism
- Cybercrime



- Domestic abuse
- Homelessness
- So-called 'honour-based' abuse (including Female Genital Mutilation (FGM) and Forced Marriage)
- Preventing radicalisation
- The Prevent duty
- Channel
- Additional support
- Child on child abuse
- Sexual violence and sexual harassment between children in schools and colleges
- Upskirting
- The response to a report of sexual violence or sexual harassment

E: OTHER SAFEGUARDING ISSUES TO BE AWARE OF

Financially Motivated Sexual Extortion

Increasingly, children are being sexually coerced and exploited for money, rather than any sexual motivation underpinning the actions of the offender. The offender (known, posing as known, or unknown children/adults) will demand the victim child self-generate nudes or semi-nudes (see below) and send them to them. Whether or not the victim child actually sends these images/videos, the perpetrator will blackmail the victim by threatening to share these or other images online, and occasionally offline, with the wider community i.e. family, friends, staff, and/or media unless the child victim sends money to them. This is sometimes known as 'sextortion' and there has been a rapid increase in these situations being reported nationally; many cases of course will not have been reported by children for a number of reasons.

Some young people have had deteriorating mental health due to this extortion. For this reason, the school will hold an 'open door' and supportive approach in regard to pupils sending nudes/semi nudes, rather than seeking to criminalise them. This approach will enable pupils to feel able to share that they have shared nudes/semi-nudes, or been asked to do this, with the aim that they can receive the support they so vitally may need in a timely manner. This is not the same as condoning or accepting the sharing of images/videos as the norm. The school is mindful that much of this behaviour is illegal and will follow their statutory duties where appropriate, including reporting matters on a case-by-case basis to the Police and Social Care as needed.

Resources

Find more information and advice from the [Internet Watch Foundation](#).

AI Generated Child Sexual Abuse Material (CSAM)

The use of Artificial Intelligence (AI) to generate Child Sexual Abuse Material (CSAM) is increasing, and the technology is fast improving. As with all online safety challenges, this challenge is inherently international. The term 'AI CSAM' to refer to criminal images or videos of the sexual abuse of children that are generated or edited by AI technology, and 'real CSAM' to clearly distinguish CSAM that is not generated or edited by AI technology.

The term 'deepfake' is used variously in the AI field, in the media, and among the wider population.

Sometimes it is taken to refer to all AI-generated or AI-edited content.

This policy uses the term 'deepfake' to refer to partially synthetic content: edited content that is based on a real image or video but has been altered using AI technology. Incredibly realistic deepfake, or partially synthetic, videos of child rape and torture are made by offenders using AI tools that add the face or likeness of a real person or victim. This is particularly important in the context of 'deepfake videos' edited (or 'faked') real videos which should be clearly distinguished from fully synthetic videos created by text-to-video or text-to-image-to-video

The Internet Watch Foundation (IWF) stated in their most recent report the following 5 key findings:

1. Increase in AI-generated Child Sexual Abuse Material: The latest findings show over 3,500 new AI-generated criminal child sexual abuse images have been uploaded on to the same dark web forum as previously analysed in October 2023.
2. More Severe Images: Of the AI-generated images confirmed to be child sexual abuse on the forum, more images depicted the most severe Category A abuse, indicating that perpetrators are more able to generate complex 'hardcore' scenarios.
3. Emergence of AI Child Sexual Abuse Videos: AI-generated child sexual abuse videos, primarily deepfakes, have started circulating, highlighting rapid technological advancements in AI models/generators. Increasingly, deepfake videos shared in dark web forums take adult pornographic videos and add a child's face using AI tools.
4. Clear Web Increase: There is a noticeable increase in AI-generated child sexual abuse imagery on the clear web, including on commercial sites.
5. AI Child Sexual Abuse Featuring Known Victims and Famous Children: Perpetrators increasingly use fine-tuned AI

Faith or belief- related child abuse

As a school, we respect, and do not challenge parents/carers' rights to have faiths or beliefs, but where these may/have led to abuse and/or a risk of harm to a pupil, we will seek advice from the authorities as required.

What is faith/belief related abuse?

Abuse linked to faith or belief is where concerns for a child's welfare have been identified, and could be caused by a belief in witchcraft, spirit or demonic possession, ritual or satanic abuse features; or when practices linked to faith or belief are harmful to a child. Research suggests that in 2023, the abuse of 2,140 was linked to faith/beliefs.

It is important to note that child abuse linked to faith or belief is not confined to one faith, nationality, and/ or ethnic community. Examples of this form of abuse have been recorded worldwide across various religions including Christians, Muslims, and Hindus. The number of known cases suggests that only a small minority of people who believe in witchcraft or spirit possession go on to abuse children and adults. Abuse may happen anywhere, but it most commonly occurs within the child's home. Under-reporting of abuse is, however, likely. Harm to a child can take place due to the following known reasons:

- abuse as a result of a child being accused of being a 'witch'
- abuse as a result of a child being accused of being possessed by 'evil spirits'

- ritualistic abuse which is prolonged sexual, physical and psychological abuse
- satanic abuse which is carried out in the name of 'satan' and may have links to cults
- any other harmful practice linked to a belief or faith

In terms of the categories, explored above in section A:

Physical abuse: can involve ritualistic beating, burning, cutting, stabbing, semi-strangulating, tying up the child, or rubbing chilli peppers or other substances on the child's genitals or eyes.

Emotional abuse: can occur in the form of isolation. A child may not be allowed near or to share a room with family members and threatened with abandonment. The child may also be convinced that they are possessed.

Neglect: the child's family and community may have failed to ensure appropriate medical care, supervision education, good hygiene, nourishment, clothing or warmth.

Sexual abuse: children who have been singled out in this way can be particularly vulnerable to sexual abusers within the family, community or faith organisation. These people exploit the belief as a form of control or threat.

Common factors and causes

A range of factors can contribute to the abuse of a child for reasons of faith or belief. Some of the most common ones are below:

Belief in evil spirits that can 'possess' children is often accompanied by a belief that a possessed child can 'infect' others with the condition. This could be through contact with shared food, or simply being in the presence of the child.

Scapegoating occurs when a child is singled out as the cause of misfortune within the home, such as financial difficulties, divorce, infidelity, illness or death.

Behaviour that is attributed to spiritual forces. Examples include a child being perceived as disobedient, rebellious, overly independent, wetting the bed, having nightmares or falling ill.

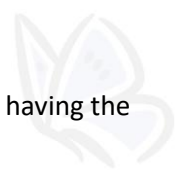
Physical, learning, and/or emotional differences that single a child out. Documented cases included children with learning disabilities, mental health issues, epilepsy, autism, stammers, deafness and LGBTQ+.

Gifts and uncommon characteristics and/or when a child has a particular skill or talent can sometimes be rationalised as the result of possession or witchcraft. This can also be the case if the child is from a multiple or difficult pregnancy.

Complex family structures such as when a child living with extended family, non-biological parents, or foster parents can place them more at risk.

Signs and indicators

- physical injuries, such as bruises or burns (including historical injuries/scarring)
- a pupil reporting that they are or have been accused of being 'evil', and/or that they are having the 'devil beaten out of them'
- the pupil or family may use words such as 'kindoki', 'djin', 'juju' or 'voodoo' - all of which refer to



spiritual beliefs

- a pupil becoming noticeably confused, withdrawn, disorientated or isolated and appearing alone amongst other pupils
- a pupil's personal care deteriorating (e.g. rapid loss of weight, being hungry, being unkempt with dirty clothes)
- it may be evident that the pupil's parent or carer does not have a close bond with the pupil
- a pupil's attendance at school becomes irregular or there is a deterioration in their performance
- a pupil is taken out of a school altogether without another school place having been arranged
- a pupil wearing unusual jewellery/items or in possession of strange ornaments/scripts.

Resources

National Schools Safeguarding Guidance (developed by Metropolitan Police Service)

The Guidance for Schools and Colleges: Safeguarding Children from Sexual Violence, CSE and Harmful Practices has a chapter on CALFB.

Schools Charter on Ending Harmful Practices

This Schools Charter encourages the delivery of high quality, safeguarding focused inputs on harmful practices.

UK Government: National Action Plan to Tackle Child Abuse Linked to Faith or Belief

Centre for FMD: 21-02-2024---Child-Abuse-linked-to-Faith-or-Belief-Leaflet.pdf

Child abuse linked to faith or belief | Metropolitan Police

Behavioural signs in parents/carers (or other adults)

Signs may include:

- placing unrealistic expectations on the child i.e. demanding a level of academic or physical performance of which the child is not capable
- offering conflicting or unconvincing explanations of any injuries to the child/behaviours of the child
- delaying seeking medical treatment for the child's mental/physical health (including not taking the child to a specialist medical practitioner immediately when a child discloses suicidal ideation in school)
- failing to meet the basic needs of the child in regard to clothing, housing, food etc
- having alcohol/drug dependency/unmanaged mental illness and refusing support
- appearing indifferent to, is emotionally unavailable, or overtly rejecting, the child
- denying the existence of or blaming the child for the child's behaviours at home or at school
- seeing and describing the child as entirely worthless, burdensome, or in another negative light
- refusing offers of support to meet the child's need(s)
- refusing to consent to referrals to external agencies to meet their child's needs/does not engage as expected.

Grooming

Grooming is the process by which an individual prepares a child, significant adults, including staff, and the environment for abuse and/or exploitation of this child. The perpetrator's motivation can be sexual, or increasingly financially related. Children and young people can be groomed online or in the real world, by a stranger or by someone they know, or someone pretending to be someone they know, including peers.

Groomers may be of any gender identity or sexual orientation. They could be of any age, including another young person. They may be located in the country where the child lives, or if online exploitation, could be resident anywhere in the world.

Modus operandi of grooming

Target vulnerable victim: Perpetrators target victims who are vulnerable, isolated, insecure and/or have greater emotional needs. This may happen over a number of months/years, or may happen very quickly.

Gain victim's trust: Offenders may allow a child to do something (e.g. eat ice cream, stay up late, view pornography) which is not normally permitted by the child's parents or the school in order to foster secrecy and intimacy.

Gain the trust of others: Institutional offenders are often popular with children and parents, and often staff, successfully grooming not only the victim but also other members of the victim's family and the school community at large.

Filling a need/becoming more important to the child: This can involve giving gifts, rewards, additional help or advice, favouritism, special attention and/or opportunities for special trips or outings.

Isolating the child: The perpetrator may encourage dependency and subtly undermine the victim's other relationships with friends or family members. This may involve the offender making themselves the only/main point of contact in school for the child.

Sexualising the relationship: This can involve playful touches, tickling and hugs. It may involve adult jokes and innuendo or talking as if adults, for example about marital problems or conflicts.

Maintaining control and secrecy: Offenders may use their professional position to make a child believe that they have no choice but to submit to the offender.

Making threats: Offenders may threaten the child/their family/their friends/their pet with harm if they tell/do not continue with the abuse.

Blackmailing: Offenders may blackmail their victim, for example, by saying that they will share any intimate photos of the child with friends and family.

Creating opportunity: Offenders will gradually seek to create the time and opportunity to allow for the grooming process to occur, and the eventual abuse of the child (ren). This behaviour may involve the offender creating situations where they have access more easily, in unstructured scenarios and/or encouraging the children), and occasionally the parent/care unwittingly to do so.

Signs of grooming manifested by sex offenders (paedophiles)

It is important to remember that not all sex offenders will exhibit the signs listed below and if an individual exhibits some or all of these signs, it does not mean that they are a sex offender:

- Being overly affectionate with a child
- Affording special attention or preferential treatment to a child (ren)
- Gravitating towards a specific sex of pupil or year group
- Creating and/or spending excessive time alone with a child outside of the classroom/school
- Frequently spending time with a child in private or isolated areas in the school
- Transporting a child to or from the school
- Making friends with a child's parents and visiting their home socially



- Offering to provide a particular child additional educational support
- Acting as a particular child's confidante
- Giving small gifts, money, toys, cards, letters to a child
- Using texts, telephone calls, e-mails, messaging apps, and/or social networking sites to inappropriately communicate with a child
- Exhibiting flirtatious behaviour or making suggestive remarks or comments of a sexual nature around a child
- Making inappropriate and/or suggestive remarks about children to other staff

Signs and indicators that a child may be being groomed

Many children and young people do not understand that they are being/have been groomed, or that what has happened is abuse and/or exploitation. The signs that a child is being groomed are not always obvious. Groomers will also go to great lengths not to be identified.

Children may:

- be very secretive, including what they are doing online
- spend lots, much more, or much less time online, texting, gaming or using social media
- are withdrawn, upset or outraged after using the internet or texting
- are secretive about who they're talking to and what they're doing online or on their mobile phone
- have lots of new phone numbers, texts or e-mail addresses on their mobile phone, laptop or tablet.
- have more than one phone
- be in a relationship with an older child offline/online (or perceive themselves to be with an older child)
- go to unusual places to meet friends; not disclose who they are meeting, or give false accounts of who they are meeting
- have new things such as clothes or mobile phones that they can't or won't explain
- have increasing or new access to drugs and alcohol
- go missing from home or school; or are increasingly likely to be absent from school without adequate explanation
- display behavioural changes; these can be both negative and positive
- have sexual health issues
- express suicidal ideation and/or self-harm (including dysfunctional eating and/or excessive exercise)
- express indicators that they are anxious and/or depressed
- have low self-esteem (or occasionally high self-esteem in earlier stages of grooming)
- steal items or money/sell theirs or others' items for money

In older children, signs of grooming can easily be mistaken for 'normal' teenage behaviour, but you may notice unexplained changes in behaviour or personality, or inappropriate sexual behaviour for their age. See the NSPCC website for further information about grooming.

Adverse Childhood Experiences

An Adverse Childhood Experience (ACE) is a stressful event in childhood (note: a child is up to 18 years) that can have a lasting impact on mental health, behaviour, and education throughout childhood, adolescence and into adulthood. An ACE can mean that a child has already been a victim of abuse, neglect, and/or exploitation, or growing up in a household in which alcohol or substance misuse, mental ill health, domestic violence and/or criminal behaviour are present. ACEs can affect brain development, increase the risk of chronic health conditions, mental illness, and substance abuse in adulthood. Recognising and preventing ACEs is therefore crucial for promoting child well-being and reducing the long-term impact of these

experiences.

Resources

ACEs (Adverse Childhood Experiences) - Early Education

A practical handbook on Adverse Childhood Experiences (ACEs) Delivering prevention, building resilience and developing trauma-informed systems: A resource for professionals and organisations - World Health Organization Collaborating Centre On Investment for Health and Well-being

Understanding trauma and adversity | Resources | YoungMinds

The Little Book of Adverse Childhood Experiences | National Education Union

Trauma and child brain development training | NSPCC Learning



This document must be read in conjunction with the GHES Child Protection & Safeguarding Policy (Sept. 2026). It has been written to take into account the different working environment staff find themselves in whilst working on the children's ward or in the classroom at GRH.

All of the safeguarding procedures found in GHES Child Protection & Safeguarding Policy (Sept. 2026) remain the same with the following additions:

Safeguarding Documentation at GRH Children's Ward for use by Teaching Staff

Teaching and support staff at GRH should use an **RMN Stationery Checklist** to clearly show ALL equipment and resources being left in a room with an 'at risk' pupil. These resources should all be counted back out and collected by the RMN. The RMN should agree to monitoring the pupil's use of an iPad, if left in the room and should sign the 'Acceptable Use' form (APPENDIX C).

Procedure following a disclosure, safeguarding concern or incident

For teaching and support staff at GHES, Trudi Scott and Robyn Roberts (DDSL) should be the first point of contact for any safeguarding disclosure/concern or incident. Trudi/Robyn will always consult with the DSL for GRH children's ward (who has direct access to all services) alongside another member of the safeguarding team from GHES.

In the absence of Trudi Scott or Robyn Roberts, the DSL for GRH Children's Ward (Michelle/Emily/Jaz) should be spoken to and then anyone from the GHES safeguarding team should be contacted – for both, **this should be verbal and immediately.**

In the event of receiving information retrospectively, it should be shared and documented as soon as is reasonably possible. It should be documented as being retrospective, who received the information, any actions taken and why there was a delay.

Safeguarding Record Keeping & information Sharing

Many students who are on GRH children's ward will not be on our main record keeping database, CPOMS. However, if they are with GHES outreach, the incident should be recorded on CPOMS in the usual manner.

For those that are not on roll with GHES, a safeguarding incident form (Appendix A) should be completed and saved in the following area:

SharePoint – GRH – Safeguarding – child's folder.

SharePoint – GHES Students – Safeguarding - GRH

GRH ward staff will be responsible for adding any safeguarding incidents or concerns on the child's notes in black ink.

If the child is not on roll with GHES, contact should be made with the DSL from the child's main school on the same day, where possible, and if not, within 24 hours, to share concerns and to also determine who to send the safeguarding document to.

Written 11/11/22 BW
Updated February 2026 TS

APPENDIX TWO – DOCUMENTS & POLICIES FOR ALL STAFF

The following policies and documents are required to be read and signed at the start of every academic year and when any updates are made during the academic year:

- GHES Safeguarding Child Protection Policy and Procedures 2026
- KCSIE Sept 2026
- Key Changes to KCSIE 2026
- SCR Annual Update Signing Sheet [an electronic form for 2026]
- Annual Declaration (DBS updates and Disqualification Declaration)
- Generic Risk Assessment – Occupational Driving
- Online Safety Policy

Other Safeguarding Policies that accompany the above can be found in the GHES SharePoint site > Policies & Protocols

- GHES General Behaviour Policy, Employee Code of Conduct and Whistleblowing Procedure
- Staff Signature Sheet for Behaviour Policy and Code of Conduct
- GHES Visitors Terms and Conditions
- GHES and GCC Staff ICT and Social Media Acceptable Use Policy
- Escalation of Concern Form - GSCP Levels of Intervention Guidance (GSCP website)
- GSCP Revised Guidance for Safeguarding Children (July 2018)
- Guidance for Safer Working Practice for Adults Working with Children in Education
- Guidance on Appropriate Language Toolkit for Professionals
- Substance Misuse Screening Tool and Referral Form (GSCP website)
- Working Together to Safeguard Children (DfE March 2026)
- GHES Early Help statement
- GHES Relationships Policy
- GHES Online Safety Policy
- 2023 Prevent Guidance
- GHES Offsite Educational Visits policy
- The Children Act 1989
- The Children Act 2004
- Education Act 2002 (section 175)
- The Education (Pupil Information) (England) Regulations 2005
- Gloucestershire Safeguarding Children Partnership (Inter-agency Child Protection and Safeguarding Children Procedures) (Electronic – live online – <https://www.gloucestershire.gov.uk/gscp>)
- Keeping Children Safe in Education (KCSIE): statutory guidance for schools and colleges (DFE guidance September 2026)
- Child Sexual Exploitation (Definition and a guide for practitioners, local leaders and decision makers working to protect children from Child Sexual Exploitation (February 2017)

