Novalis Trust | Cotswold Chine School

Safeguarding & Child Protection Policy and Procedures

2026-2027

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1. Policy Statement

1.1 This document sets out our policy and procedures for safeguarding and protecting the welfare of all children[1] who attend and/or who live at Cotswold Chine School (**School**).

1.2 The safeguarding of children is the School's highest priority. It is of paramount importance that every child feels safe and is protected from maltreatment including any form of abuse or neglect. The School recognises the importance of a whole school safeguarding culture which underpins every aspect of school life.

1.3 This policy applies to all staff (teaching and non-teaching) and volunteers as well as the members of the board of Trustees. The School recognises that everyone who comes into contact with children and their families/carers has a role to play in ensuring that they are effectively safeguarded.

1.4 It is the intention that this policy will reflect the utmost importance which the School gives to safeguarding and the protection of children's welfare. It takes into account and is intended to reflect the guidance and requirements set out in *Keeping Children Safe in Education 2026: Statutory guidance for schools and colleges*, *Working Together to Safeguard Children (2026)*, *Prevent Duty Guidance: for England and Wales*, *Meeting digital and technology standards in schools and colleges (2022)*, *Information sharing advice for safeguarding practitioners (2024)*, *Online Safety Act 2023*, *The Education (Independent School Standards) Regulations 2014*, *The Children's Homes (England) Regulations 2015* and the accompanying *Guide to the Children's Homes Regulations including the quality standards (April 2015)*.

1.5 Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- providing help and support to meet the needs of children as soon as problems emerge.
- protecting children from maltreatment, whether the risk of harm comes from within or outside the child's family/home, including online.
- preventing the impairment of children's mental and physical health or development.
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes (KCSIE 2026).

[1] Although the terms '*child*' and '*children*' refer to all children up to the age of 18, the policy applies equally to those pupils who are aged 18 or above (referred to as '*young adults*'). However, different safeguarding procedures apply when dealing with disclosures or allegations involving young adults (see Annex 2).

1.6 In order to fulfil its responsibilities, the School aims to create a culture of vigilance when it comes to safeguarding matters and to always work in the best interests of those in our care.

1.7 The School recognises that children and young adults with special educational needs and disabilities are particularly vulnerable to potential maltreatment. In particular, they are at greater risk of: (a) assumptions being made that indicators of possible abuse (e.g. behaviour, mood, and injury) related to their disability meaning that they are not explored properly; (b) peer group isolation; (c) being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; (d) communication barriers and difficulties in overcoming these barriers; and (e) issues over cognitive understanding,

1.8 The School will therefore take all reasonable steps to:

- practice safe recruitment by checking the suitability of staff and volunteers (including staff employed by another organisation) to work with children and vulnerable adults.

- carry out all necessary checks on the suitability of people who serve on the School's board of Trustees in accordance with any applicable regulations and guidance.

- ensure that, where the School ceases to use the services of any person (whether employed, self-employed or a volunteer) because that person was considered unsuitable to work with children or vulnerable adults, a prompt and detailed report will be made to the Disclosure & Barring Service (DBS).

- ensure that, where staff from another organisation are working with our children on another site, we have received written assurances that appropriate suitability checks and procedures apply to those staff.

- follow the Gloucestershire Child Protection Procedures published by the Gloucestershire Safeguarding Children Partnership (GSCP).

- protect each child from any form of maltreatment, whether from an adult or another child (further details of the type of maltreatment covered by this policy are set out in Annex 3).

- prevent the impairment of any child's mental and physical health or development.

- be alert to signs of maltreatment both in the School and from outside.

- deal appropriately with every suspicion or complaint of maltreatment.

- design and operate procedures which promote this policy.

- design and operate procedures which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations (any allegations

against staff will be dealt with in accordance with the GSCP Allegations Management Procedure).

- support children who have been maltreated, in accordance with his/her agreed child protection plan.
- be alert to the medical needs of children with medical conditions.
- operate robust and sensible health & safety procedures.
- take all practicable steps to ensure that school premises are as secure as circumstances permit.
- ensure that all children receive appropriate tuition and guidance about safeguarding and child protection matters including online safety.
- operate clear and supportive policies on drugs, alcohol, and substance misuse.
- consider and develop procedures to deal with any other safeguarding issues which may be specific to individual children.
- have regard to guidance issued by the Department for Education in accordance with Education Act 2011 and associated regulations.

1.9 All staff should be aware that children 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. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. Staff are therefore trained and encouraged to use professional curiosity with children and speak to the DSL if they have concerns about a child. Staff are supported to build trusted relationships with children and young people which facilitate communication.

2. Community Based Early Help and Targeted Family Help

2.1 Early help means providing support as soon as a problem emerges, at any point in a child's life. This can include community based Early Help provided through universal services and other community services but can also include targeted Family Help which is co-ordinated by a child's local authority to address specific concerns within a family. The School recognises that 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 behaviour and may prevent escalation of sexual violence. Staff members should be particularly alert to the potential need for early help 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 pregnant and/ or is a parent themselves
- has exhibited early signs of abusive, violent and/or harmful behaviours
- is showing signs of being drawn into 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 been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of exploitation, modern slavery, trafficking, including sexual and/ or criminal exploitation.
- is at risk of being radicalised into terrorism
- 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 or other drugs themselves.
- is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage.
- is a privately fostered child.

2.2 Any member of staff who believes that there may be an emerging problem which means that a child might benefit from Early Help or Family Help should notify the Designated Safeguarding Lead who will carry out an assessment to identify whether they might benefit from the provision of early help services. If it is identified that early help services might be beneficial the Designated Safeguarding Lead will support the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff members may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases will be kept under constant review, and consideration will be given to a referral to children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse. Further guidance on effective assessment of the need for Early Help can be found in *Working Together to Safeguard Children (2026).*

3. Safeguarding Procedures

3.1 Every complaint, suspicion, allegation, or disclosure of maltreatment from within or outside the School will be taken seriously and, where appropriate, will be referred to an external agency such as the Gloucestershire Children and Families Front Door, the police or the NSPCC in accordance with the procedures published by the Gloucestershire Safeguarding Children Partnership (GSCP). Different procedures apply depending on whether the matter involves a suspicion or allegation against a member of staff (referred to below as an "allegation") or whether it involves a suspicion, complaint or disclosure of maltreatment occurring outside the School (referred to below as a "disclosure").

3.2 A flowchart showing a summary of the procedure for reporting disclosures and allegations of maltreatment involving a child under 18 is set out at Annex 1. If the disclosure or allegation involves a young adult aged 18 or over, the matter will be dealt with in accordance with the School's Post-18 Safeguarding Procedure (see Annex 2).

3.3 All matters relating to safeguarding and welfare which arise within the education setting will be the responsibility of **Hannah Dury** ("*Designated Safeguarding Lead for Education*"). If she is unavailable, her duties will be carried out by **Lucy Jones and Becky Kent** (the "*Deputy Safeguarding Officers for Education*"). All matters relating to safeguarding and welfare which arise within the residential care setting will be the responsibility of **Eleanor Dall** and **Tim Makaruk** ("*Designated Safeguarding Leads for Residential Care*"). If they are unavailable, their duties will be carried out by **Jenny Hook** and **Chas Earley** (the "*Deputy Designated Safeguarding Officers for Residential Care*"). In the unlikely event that neither the relevant Designated Safeguarding Lead nor the Deputy Safeguarding Officers are available, their duties will be carried out by **Jake Lukas** (Chief Executive). The contact details of all relevant individuals are set out at the end of this policy.

Initial action

3.4 A member of staff suspecting or hearing of an allegation or disclosure of maltreatment:

- Must listen carefully to the child and keep an open mind. Staff should not make a decision as to whether or not the maltreatment has taken place. Staff must make an immediate risk assessment and consider the safety of those immediately involved, or others who could be potentially at risk. This may require immediate action such as moving a child or member of staff.

- Must not ask leading questions, that is, a question which suggests its own answer.

- Must reassure the child but not give a guarantee of absolute confidentiality. The member of staff must explain that they need to pass the information to the Designated Safeguarding Lead who will ensure that the correct action is taken.

- Should reassure any child that has disclosed that they are being taken seriously and that they will be supported and kept safe. The child should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment, nor should they ever be made to feel ashamed for making a report.

- Must keep a sufficient written record of the conversation. The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. The record should be signed by the person making it and should use names, not initials. The record must be kept securely and handed to the Designated Safeguarding Lead immediately if it is considered that there is an immediate risk of harm and as soon as possible (and in any event within 12 hours) in the case of all other concerns.

- Must ensure that all evidence, (for example, scribbled notes, mobile phones containing text messages, clothing, and computers) is safeguarded and preserved.

Reporting

3.5 All allegations or disclosures of maltreatment (however trivial they may seem) must be reported to the relevant Designated Safeguarding Lead (i.e. to Hannah Dury if the allegation or disclosure is made in the education setting or to Eleanor Dall if the allegation or disclosure is made in the residential care setting) as follows:

– *Concerns arising during normal working hours*: all concerns should be reported directly to the relevant Designated Safeguarding Lead by telephone on 01453 837171. In the absence of the relevant Designated Safeguarding Lead the matter should be reported to the Deputy Safeguarding Officer.

- *Concerns arising outside normal working hours*: If an urgent response is required because there is an immediate risk to a child then the out of hours line should be telephoned – 01453 837171. If there is no immediate serious risk to a child, the Out of Hours Safeguarding referral form must be completed and sent to CC-OOH-Safeguarding@cotswold-chine.org.uk

3.6 If the allegation involves the Designated Safeguarding Lead, the matter should be reported to the Chief Executive.

3.7 Whilst it is anticipated that any serious concerns about a child or allegations against staff members will normally be reported to the Designated Safeguarding Lead in the first instance, anyone can report the matter immediately using Gloucestershire Children and Families Front Door which is open from 9am – 5pm:

- Telephone: 01452 426565

- E-mail: childrenshelpdesk@gloucestershire.gov.uk

3.8 When considering how to report a concern or complaint, ensuring the safety and welfare of the child concerned should be the overriding consideration. If a crime is in the process of being committed, staff can also contact the local police directly themselves.

Record keeping

3.9 All concerns, discussions and decisions made, and the reasons for those decisions will be recorded in writing by the Designated Safeguarding Lead. Information will be detailed, accurate, kept confidential and stored securely. The records will include:

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

3.10 If in doubt about the recording requirements, staff should discuss the matter with the relevant Designated Safeguarding Lead.

Action by the Designated Safeguarding Lead

3.11 The action to be taken will take into account:

- The procedures published by the Gloucestershire Safeguarding Children Partnership (GSCP).
- The nature and seriousness of the allegation or disclosure. A complaint involving a serious criminal offence will always be referred to the particular child's placing authority, Social Services Department, Ofsted and/or the police.
- The wishes of the child who has complained, provided that the child is of sufficient understanding and maturity and is properly informed. However, there may be times when the situation is so serious that decisions may need to be taken, after all appropriate consultation, that override a child's wishes. If a child is over 16 their mental capacity will be taken into account in accordance with the relevant guidance.
- The wishes of the child's parent(s) provided they have no interest which is in conflict with the child's best interests and that they are properly informed. Again, it may be necessary, after all appropriate consultation, to override parental wishes in some circumstances. If the Designated Safeguarding Lead is concerned that disclosing information to parents would put a child at risk, he or she will take further advice from the relevant professionals before making a decision to disclose.
- Duties of confidentiality, so far as applicable.

- The lawful rights and interests of the school community as a whole including its employees and its insurers.

- If there is room for doubt as to whether a referral should be made, the Designated Safeguarding Lead may consult with the Local Authority Designated Officer, Social Services department, or other appropriate professionals on a no-names basis without identifying the family. However, as soon as sufficient concern exists that a child may be at risk of significant harm, a referral will be made without delay.

- The requirement to report to the police any evidence of a child becoming involved in prostitution, or of unauthorised persons picking children up, contacting children in the School, or observed trying to make contact with children outside the School.

Referrals to external agencies

3.12 If the Designated Safeguarding Lead identifies that a referral is appropriate, disclosures in relation to maltreatment by individuals other than members of staff will be referred to the appropriate contact within statutory services. For allegations against any staff members (including those not directly employed at the school such as trainee teachers), the matter will be referred in the first instance to the Local Authority Designated Officer. Concerns about a staff member's conduct may also be referred to the Disclosure and Barring Service (DBS) where the Trust considers that the DBS should be made aware of the circumstances.

3.13 If the initial referral is made by telephone, the Designated Safeguarding Lead will confirm the referral in writing as soon as possible and normally within 24 hours. If no response or acknowledgment is received within three working days, the Designated Safeguarding Lead will contact the external agency again.

3.14 Where appropriate, the Designated Safeguarding Lead will also inform the relevant office of Ofsted without delay in accordance with Regulation 40 Part 5 (Policies, records complaints, and notifications) of the Children's Homes (England) Regulations 2015. It may also be appropriate to contact the Police depending on the circumstances. Further information can be found here - *When to call the police: Guidance for schools & colleges.*

Informing parents/carers/social workers

3.15 The Designated Safeguarding Lead will inform the social worker and, where appropriate, the parent(s) or carer(s) of the child(ren) involved about the allegation or disclosure as soon as possible if they do not already know of it. However, where a strategy discussion is required, or police or children's social care services need to be involved, parents or carers will not be informed until the relevant agencies have been consulted and have agreed what information can be disclosed. Whenever a social worker, parent or carer is informed of an allegation or disclosure, they will be reminded of the need to maintain confidentiality whilst the investigation is ongoing. The Designated Safeguarding Lead will also keep the child's social worker and, where

appropriate, parent(s) or carer(s) informed about the progress of the case and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of any disciplinary hearing, and the information taken into account in reaching a decision, will not normally be disclosed, but the social worker and, where appropriate, parents or carers of the child may be informed of the outcome in confidence.

3.16 In any event, every child and their parent(s) will be informed in writing prior to the child's placement, of their right to make their own complaint or referral to the Social Services department or the Child Protection Unit of the police and will be provided with contact names, addresses and telephone numbers, as appropriate.

Informing staff members

3.17 The staff member who reported the allegation or disclosure along with any other relevant staff members will normally be informed in supervision meetings of the progress and outcome of any referral. However, it may not be appropriate to provide full details if there is a risk that this could compromise an ongoing investigation, or any duties of confidentiality owed by the School to the staff member(s) or other individuals who are the subject of the allegation or disclosure.

Contextual safeguarding

3.18 The School recognises that safeguarding and child protection incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside the School. All staff should 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. All staff, but especially the Designated Safeguarding Lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including but not limited to sexual exploitation (including harassment and exploitation), domestic abuse teenage relationship abuse (including physical, sexual, emotional abuse and stalking), criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation. Assessments of children should always consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. In particular, children's social care assessments should consider such factors so the School will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse. See *Multi-agency practice principles for responding to child exploitation and extra-familial harm.*

Safeguarding requirement relating to the school premises

3.19 The School recognises its obligation to provide appropriate facilities for children that do not compromise their safety, comfort, privacy and dignity. The School provides separate toilet facilities for boys and girls on the school site, some of which are

individual toilets. Self-contained individual toilets are available for use by children questioning their gender. All toilets within the residential homes are individual, intended for use by one child at a time and locked from the inside.

4. Particular safeguarding issues

Allegations against staff members

4.1 The School has procedures for dealing with allegations against staff (including any supply staff, trainee teachers, volunteers and contractors who work with children) that aim to strike a balance between the need to protect children from maltreatment and the need to protect staff and volunteers from false or unfounded allegations. These procedures follow the guidance in Part 4 of *Keeping Children Safe in Education (2026)* and the *Allegations Management Procedure* published by the Gloucestershire Children's Safeguarding Partnership.

4.2 The Allegations Management Procedure will be invoked if a complaint or allegation is made, or a concern is raised that a member of staff or volunteer has:

- behaved inappropriately in a way that has harmed or may have harmed a child; or
- possibly committed a criminal offence against or related to a child; or
- 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. This is to take account of situations where a person's behaviour outside school may suggest 'transferable risk'.

4.3 Suspension will not be an automatic response to an allegation. Full consideration will be given to all the options, subject to the need to ensure the safety and welfare of the child or children concerned and the need for a full and fair investigation.

4.4 Where an allegation is made against a member of staff, the Designated Safeguarding Lead will be responsible for reporting the matter to and liaising with the Local Authority Designated Officer and other relevant agencies (e.g. the police, the DBS and Ofsted), co-ordinating the internal investigation of the allegation and preparing any reports or risk assessments that may be required. The Designated Safeguarding Lead will also keep the Trust's HR team informed of any allegations against staff and the status of any investigation. Where appropriate, any staff member who is the subject of a safeguarding allegation will be discussed at the Trust's weekly HR meeting which is chaired by either the Trust's Chief Executive or Deputy Chief Executive, both of whom are members of the Trust's safeguarding team.

4.5 Where an allegation is made against the Designated Safeguarding Lead, the matter should be reported immediately to the Chief Executive.

4.6 The School recognises that being the subject of an allegation can be a stressful experience for the member of staff concerned and seek to take appropriate steps to minimise the stress inherent in the allegations process. Any staff member who is the subject of an allegation will be provided with the name and contact details of a senior member of staff (other than the Designated Safeguarding Lead) who will keep them informed of progress and to provide such support as may be appropriate. If the staff member is suspended whilst the allegation is investigated, they will generally not be prevented from maintaining social contact with colleagues unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

4.7 Guidance and training will be given to staff during their initial induction period to ensure that their behaviour and actions do not place children or themselves at risk of harm or of allegations of harm to a child. This is initially discussed in the first day induction training and further explored in child protection training. Lower-level concerns should initially be discussed during line manager supervision meetings and discussions. More concerning staff conduct incidents or breaches of policy should be referred to the senior leadership weekly HR meeting. Follow up actions may include close supervision and mentoring for the employee or possible disciplinary action under the disciplinary procedures. Further information about the School's policies on staff conduct is included in the Staff Handbook. The School's policy on physical restraint and use of reasonable force is included in the Behaviour Support and Physical Intervention Policy.

4.8 If a member of staff has concerns that another member of staff has or is likely to behave in a way set out in paragraph 4.2 above, they should report the matter immediately to the Designated Safeguarding Lead. If a member of staff has concerns about the Designated Safeguarding Lead, the matter should be reported immediately to the Chief Executive. Any concerns about the Chief Executive should be reported immediately to the Chair of Trustees. All contact numbers are listed in section 8 of this policy.

4.9 If the School ceases to use the services of a member of staff (or a trustee or volunteer) in circumstances where it is believed that they may be unsuitable to work with children or vulnerable adults, a prompt and detailed report will be made to the Disclosure and Barring Service. A settlement agreement will not be entered into which prevents the making of any such report. Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Trustees without delay.

4.10 The School may receive an allegation relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children. As with any safeguarding allegation, the School will follow its normal safeguarding policy and procedure including informing the LADO. There are currently no individuals or organisations using the school premises to run extra-curricular activities, community groups or sports associations.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

4.11 The School is aware of national concerns around child exploitation. Both Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. This may constitute modern slavery, and further information is available in the Modern Slavery statutory guidance.

4.12 CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including; gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online. More information including definitions and indicators is included in Annex 3.

Child-on-child abuse (including harassment and violence)

4.13 The School recognises that children are capable of abusing other children and this is a safeguarding issue for both the victim and alleged perpetrator. The School is clear that all such abuse is preventable, unacceptable and will be taken seriously. Child-on-child abuse should never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up' as this can lead to a culture of misogyny/ misandry, unacceptable behaviour and an unsafe environment for children.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between children (sometimes known teenage relationship abuse) including non-fatal strangulation;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- serious physical assault and harm, or the threat of harm with a weapon;

- sexual violence, such as rape, assault by penetration (including with an object) and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);

- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;

- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with third party;

- making or sharing of nude and semi-nude images and or videos, including those generated by AI;

- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and

- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

4.15 A member of staff who suspects or hears about an allegation of child-on-child abuse should take the action set out in paragraph 3.4 above and then report the matter to the Designated Safeguarding Lead as set out in paragraph 3.5 above. The Designated Safeguarding Lead will deal with any such allegation in accordance with the procedure set out in paragraphs 3.11 to 3.12 above. The School recognises that no reported cases of child-on-child abuse does not mean that it is not taking place, but simply not being reported. All staff receive training and information regarding the School's policy and procedures on child-on-child abuse and the important role they play in preventing it and responding where a child may be at risk of it.

4.16 *Making or sharing of nude and semi-nude images.* Any allegation involving the sharing of nude images will be dealt with in accordance with the guidance issued by the UK Council for Internet Safety (UKCIS) – *Sharing nudes and semi-nudes: advice for education settings working with children and young people.*

4.17 In particular, staff members should:

- Never view, download or share the imagery themselves, or ask a child to share or download it. If a member of staff has already viewed the imagery by accident (e.g., if a child has showed it to them before they could be asked not to), this should be reported to the Designated Safeguarding Lead.

- Not delete the imagery or ask the young person to delete it.

- Not ask the child(ren) who are involved in the incident to disclose information regarding the imagery – this is the responsibility of the Designated Safeguarding Lead.

- Not share information about the incident to other members of staff, the child(ren) it involves or their, or other, parents and/or carers.

- Not say or do anything to blame or shame any children involved.

- Explain to the child(ren) involved that it needs to be reported and reassure them that they will receive support and help from the Designated Safeguarding Lead.

4.18 *Sexual violence and sexual harassment between children.* It is essential that all victims of alleged sexual violence/harassment are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence/harassment nor should they ever be made to feel ashamed for making a report. Any staff member who suspects or hears about an allegation of sexual violence/harassment should take the initial action set out in paragraph 3.4 above and then report the matter to the Designated Safeguarding Lead as soon as possible as set out in paragraph 3.5 above. The Designated Safeguarding Lead will deal with any such reports in accordance with the advice and guidance set out in Department for Education advice in Part 5 of Keeping Children Safe in Education (2026).

4.19 *Support for those affected by child-on-child abuse*. The School will take all reasonable and necessary steps to support any child who is the alleged victim, perpetrator of or has been otherwise affected by child-on-child abuse. In particular:

- The Designated Safeguarding Lead will be responsible for reviewing and implementing whatever action is necessary and appropriate in order to ensure that the alleged victim(s), perpetrator(s) or anyone else who is affected is provided with the necessary support whilst the allegation is investigated. The appropriate action will depend on the circumstances of each individual case.

- It may be appropriate to exclude the individual against whom the allegation has been made whilst the matter is investigated, in which case the School's policy on behaviour, discipline and sanctions will apply.

- If it is necessary for a child (whether the alleged victim or perpetrator) to be interviewed by the police in relation to an allegation, the School will ensure that, subject to the advice from any relevant external agency, parents/carers are informed as soon as possible and that the child is supported during the interview by an appropriate adult.

4.20 If the external agency or agencies to whom an allegation is reported decide not to take any further action, the School will carry out its own investigation and will take all appropriate action to ensure the safety and welfare of all children involved including the child(ren) against whom the allegation is made.

Serious Violence

4.21 All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. This may involve physical assault, carrying, threatening with or using weapons often in the context of peer conflict or bullying and can be associated with criminal exploitation. Signs may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as having been frequently absent, suspended or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the Home Office's *Preventing youth violence and gang involvement: Practical advice for schools and colleges*, *Serious Violence Strategy* and *Criminal Exploitation of children and vulnerable adults: County Lines guidance*.

Mental Health

4.22 All staff at the School are made aware through training and guidance that mental health problems can include self-harm, suicidal ideation or risk of suicide. In some cases, mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

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

4.24 Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood.

4.25 Potential warning signs include:

- Significant changes in behaviour;
- Ongoing difficulty sleeping;
- Withdrawing from social situations
- Not wanting to do things they usually like, and;
- Physical signs of self-harm or neglecting themselves

4.26 Not every child who exhibits these behaviours has a mental health concern however identifying early warning signs can lead to support and early intervention. Through the Novalis Model of approach and trauma informed training strategies staff are aware of how children's experiences can impact on their mental health, behaviour, and education.

4.27 If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the child protection policy, and speaking to the relevant Designated Safeguarding Lead or a Deputy Safeguarding Officer.

4.28 The Department for Education has published advice and guidance on Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools (which may also be useful for colleges). In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance Promoting children and young people's emotional health and wellbeing. Its resources include social media, forming positive relationships, smoking and alcohol. See Rise Above for links to all materials and lesson plans. The School has implemented the Gloucestershire Healthy Living and Learning PinK PSHE curriculum which includes age linked resources for topics such as emotional health and wellbeing, safeguarding and spiritual, moral and cultural development.

Missing Child Procedures

4.29 All staff are informed of the separate procedure to be used for searching for, and if necessary, reporting, any child missing from school (see the Missing Child Policy). The procedure includes the requirement to record any incident, the action taken, and the reasons given by the child for being missing.

4.30 Any instances of children failing to attend school without prior authorisation will be dealt with in accordance with the procedure set out in the School's Attendance Policy.

4.31 All staff should be aware that children being absent from school, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. The School aims to meet the Department of Education statutory guidance ***Working together to improve school attendance (2024).***

Online Safety

4.32 The School recognises that it is essential that children are safeguarded from potentially harmful and inappropriate online material. The School focuses on educating children and staff in the safe use of technology.

4.33 Online safety can be categorised into four areas of risk:

- **Content**: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories,

- **Contact**: being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes,

- **Conduct**: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including those generated using AI and online bullying and,

- **Commerce**: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

4.34 The prior agreement of the child's parent(s) and/or carers and/or social worker will be obtained if a child is to have access to their own mobile phone or other internet-enabled device. Children are required to be able to demonstrate a level of understanding of online safety, including the importance of maintaining a safe level of privacy and the need to only access age-appropriate social media, internet pages and apps.

4.35 All children who are authorised to use internet enabled devices are required to enter into a contractual agreement between themselves and the School. This agreement forms part of their individual risk assessment. Children are expected to use the school's Wi-Fi network which is protected using the Smoothwall firewall. When children use the school's network to access the internet, they are protected from inappropriate content by our filtering and monitoring systems which are regularly reviewed for their effectiveness. The School aims to meet the *filtering and monitoring standards* published by the Department for Education. The School also aims to meet the *Generative artificial intelligence (AI) in education* guidance to support the children's understanding of the risks and challenges alongside the opportunities and benefits of Generative AI.

4.36 The Designated Safeguarding Lead takes lead responsibility for the filtering and monitoring systems and processes that the School has in place. The Head of IT supports in maintaining and providing filtering, providing reports and alerts, and completing any actions at the request of the DSL. A review of the effectiveness of the filtering and monitoring takes place annually by the Senior Management Team and IT Team.

4.37 The filtering system blocks harmful and inappropriate content without unreasonably impacting teaching and learning. The monitoring system includes a combination of daily reports and instant notifications to ensure the safety of the children.

4.38 Where children have access to 3G/ 4G/ 5G facilities on their phones, they are expected to use this within the framework of the law and to ensure that their behaviours and

actions do not place themselves or other peers at risk of harm. Any breaches of these safety arrangements will be dealt with proportionately and will involve their wider professional and family networks. This may involve the child not having use of their phone or other device temporarily until matters are investigated further and safe future use can be guaranteed. All children know that if a concern around safeguarding or child protection occurs in relation to their use of technology, the matter may result in the police or an internal professional taking the phone or device into their possession for a period of time.

4.39 All staff who support children directly in school and in the homes have completed regular online safety training and are expected to talk with children about online safety informally, as well as formally through teacher directed PSHE personal safety education and awareness sessions. This could include learning around harmful content such as pornography, racism, misogyny/ misandry, homophobia, biphobia, sexual violence/ harassment, derogatory behaviour, physical violence and conflict, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories. Each child has an individual risk assessment regarding what they can access through the filtering system which is based on their chronological age, but which also takes into account their individual development stage and any additional needs.

4.40 The School recognises that some children may be particularly skilled or interested in computing and technology and may inadvertently stray into Cyber Crime. This can include unauthorised access to computers, 'Denial of Service' attacks or making, supplying or obtaining malware (malicious software). In the unlikely event that this occurs, the Designated Safeguarding Lead can consider making a referral to the Cyber Choices programme. The programme aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests. More information can be found at *Cyber Choices.*

4.41 Any staff member who is concerned about a child's use of the internet or technology should report the matter to the Designated Safeguarding Lead.

Video calling with children, families and professionals.

4.42 The School recognises that maintaining connections with external professionals as well as ensuring that children can remain in visual contact with their family and key people are crucially important for their welfare. As a result, the School has implemented measures to enable meetings to take place via video calls.

4.43 Any video calling arrangements are made through a monitored calendar and using laptops and devices checked and owned by the School. Only staff authorised to do so will facilitate video calls and must adhere to the rules and expectations set out in the Staff Handbook. Staff must not make video calls to children from their own homes or via any personal devices.

4.44 There are currently no remote learning systems in place. Educational materials have been sent out where relevant in hard copied packs.

Education and awareness for children

4.45 Children at the school have opportunities to learn about how they can keep themselves and others safe, including online safety. This is achieved during the school day through the Relationships and Sex Education and the PSHE curriculums. This includes learning about health and wellbeing, healthy relationships, risky relationships and living in the wider world. The School aims to create a culture of zero tolerance for sexism, racism, misogyny/ misandry, homophobia, biphobia, sexual violence/ harassment, derogatory behaviour or other forms of physical violence and conflict.

4.46 In the residential homes staff support children on an individual basis through key-working and through naturally occurring opportunities in the same way that parents and carers would in a family setting. This information is presented in an age-appropriate way. We are sensitive to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.

5. Responsibilities for Safeguarding

The Designated Safeguarding Leads

5.1 The Designated Safeguarding Lead for Education and the Designated Safeguarding Lead for Residential Care are both members of the Senior Leadership Team. They have the lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) in the School and home settings respectively. The Deputy Safeguarding Officers are trained to the same standard as the Designated Safeguarding Leads and their role is explicit in their job descriptions. Whilst the activities of the Designated Safeguarding Leads are on occasion delegated to appropriately trained deputies, the ultimate lead responsibility for child protection remains with the Designated Safeguarding Leads.

5.2 Each Designated Safeguarding Lead will:

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme and to the Police where there is a concern about radicalization as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and

- refer cases where a crime may have been committed to the Police as required.

5.3 Each Designated Safeguarding Lead is also responsible for:

- acting as a point of contact with the three safeguarding partners;
- liaising with the CEO and Deputy CEO to inform them of any issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaising with the "case manager" and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- liaising with staff (especially pastoral support staff, school nurses, IT Technicians, and SENCOs or the named person with oversight for SEN) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- acting as a source of support, advice, and expertise for all staff.
- taking the lead responsibility for understanding the filtering and monitoring systems and processes in place.

5.4 The Designated Safeguarding Leads and the Deputy Safeguarding Officers will undergo training to provide them with the knowledge and skills required to carry out their roles. The Designated Safeguarding Leads will also ensure that other staff members receive regular training and updates to ensure that they are kept up to date with local and national safeguarding concerns and learning from incidents that have taken place in the School or home.

5.5 The Chief Executive will monitor that the Designated Safeguarding Leads are fulfilling their responsibilities and that the policies, procedures and training in the School are effective and comply with the law at all times. The Chief Executive will be responsible for keeping the board of Trustees updated on all relevant matters.

Duties of Employees, Trustees and Volunteers

5.6 Every employee and Trustee of the School as well as every volunteer who assists the School is under a general legal duty to:

- protect children from harm;
- read, understand and follow at all times: (a) Part 1, Part 5 and Annex A of Keeping Children Safe in Education 2026; (b) the General Staff Rules and Conduct set out in the Staff Handbook; and (c) the provisions of this policy and procedure;
- know how to access and implement the procedures, independently if necessary;
- keep a sufficient record of any significant complaint, conversation or event;

- report any matters of concern to the relevant Designated Safeguarding Lead.

5.7 All staff are required to report to the relevant Designated Safeguarding Lead or the Deputy Safeguarding Officer (or if the concern or allegation involves the Designated Safeguarding Lead to the Chief Executive), any concern, disclosure or allegations about school practices or the behaviour of colleagues which are likely to put children at risk of abuse or other serious harm.

5.8 Any staff member who has reason to believe or is concerned that this policy has not been properly followed should raise the matter in accordance with the Whistleblowing Policy & Procedure set out in the Staff Handbook.

5.9 All staff members and members of the board of trustees also receive appropriate child protection training which is regularly updated at least annually.

5.10 The Designated Safeguarding leads are responsible for coordinating the response to lower-level concerns around staff conduct or behaviour. Decisions about follow up actions to address low level concerns will be discussed at senior manager level and with support from HR if deemed necessary. The School aims to maintain a culture where all concerns about employees (including allegations that do not meet the threshold for LADO referral) are shared responsibly, with the right person, recorded and dealt with properly. Possible actions following this would be recorded in staff supervision and may also require additional supervision and support regarding individual learning and practice development.

6. Confidentiality and Information Sharing

6.1 The child may ask the School not to tell anyone that they have experienced abuse including sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it.

6.2 Staff taking a report should never promise confidentiality as it is very likely that it will be in the best interests of the child who has been harmed to seek advice and guidance from others in order to provide support and engage appropriate agencies. Advice should be sought from the Designated Safeguarding Lead (or Deputy), who will consider the following:

- parents or carers should normally be informed (unless this would put the child at greater risk);

- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and

- rape, assault by penetration (including with an object) and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is 10,

if the alleged perpetrator is under 10, the principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach in these cases.

6.3 Ultimately, the Designated Safeguarding Lead (or a deputy) will have to balance the child's wishes against their duty to protect the victim and other children. Professional judgement should be used to ensure that the information is shared is focused and proportionate.

6.4 Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, the School will be mindful of the importance of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately.

6.5 As a matter of effective safeguarding practice, the School will take all reasonable steps to protect the anonymity of any children 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 children involved.

6.6 The School will also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

6.7 The School will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. The School will co-operate with police and Social Services to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989 in accordance with the requirements of *Working Together to Safeguard Children (2026).*

6.8 Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care (such as a child in need or a child with a protection plan). The guidance in *Information sharing advice for safeguarding practitioners (2024)* supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations with regard to the *Data Protection Act 2018 (DPA)*, *Data (Use and Access) Act (2025)* and *UK General Data Protection Regulation (UK GDPR).*

6.9 The DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the Designated Safeguarding Lead (or one of the Deputy Safeguarding Officers). Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.

7. Monitoring & review

7.1 The Designated Safeguarding Leads will monitor the day-to-day operation of this policy. The Chief Executive will regularly review that the action taken by the Designated Safeguarding Leads has been in accordance with the requirements of this policy.

7.2 The Independent Visitor appointed by the Trust pursuant to regulation 44 of the Children's Homes (England) Regulations 2015 will also review and report on a monthly basis on whether the action taken by the Designated Safeguarding Leads in relation to any safeguarding concerns arising within the care environment has been in accordance with the requirements of this policy.

7.3 A report will be made on any safeguarding matters and the operation of this policy to the members of the Board of Trustees in advance of its quarterly Board meetings so that they are able to monitor the operation of this policy and procedure.

7.4 Any deficiencies or weaknesses in regard to safeguarding arrangements that are identified through the above monitoring arrangements will be remedied without delay.

7.5 This policy will be reviewed by the Designated Safeguarding Leads on at least an annual basis and updated as appropriate. The next review will be carried out on or before the date indicated at the beginning of this policy.

8. Relevant Contacts

Role	Name	Contact details
Designated Safeguarding Lead for Education	Hannah Dury	01453 837 171
Designated Safeguarding Leads for Residential Care	Eleanor Dall Tim Makaruk	01453 837 171
Deputy Safeguarding Officers	Lucy Jones (Education) Becky Kent (Education) Jenny Hook (Care) Chas Earley (Care)	01453 837550
Chief Executive / Responsible Person	Jake Lukas	01453 837 551
Trustee with responsibility for Safeguarding	Dan Walton	01453 837 551
Gloucestershire Safeguarding Children Partnership	Gloucestershire Multi-Agency Safeguarding Hub (MASH)	01452 426 565 or childrenshelpdesk@gloucestershire.gov.uk
	Out of Hours Emergency Duty Team	01452 61 4194 or 101 (Police if a serious criminal offence has been committed)
	Local Authority Designated Officers	Nigel Hatten Nicky Power Karen Goulding Karl Carter 01452 426 994 or amadmin@gloucestershire.gov.uk

Annex 1

Safeguarding Procedure Flowchart

You are made aware of concerns about a child's welfare or safety.

Is the child at immediate risk of harm?

Yes

Take any action necessary to remove the immediate risk.
If a crime is in the process of being committed, staff can contact the local police.
If the child is at serious risk of harm call the out of hours line on **01453 837171.**

No

Initial action

- Listen to the child carefully.
- Reassure the child but do not give a guarantee of confidentiality.
- Keep a handwritten record of the conversation.
- Ensure that any evidence is preserved.
- Do not investigate or share information with anyone else other than as set out below.

Does the concern or complaint involve the Designated Safeguarding Lead?

Yes

Report the matter as soon as possible to **Jake Lukas** (Chief Executive) on **01453 837 551**
If the concern or complaint involves the Chief Executive, report the matter to **Dan Walton** (Chair of CCS) on **01453 837 551**

The Chief Executive or Dan Walton will review the matter and, if appropriate, refer it to the relevant external agencies

No

For safeguarding concerns within working hours, staff should contact a DSL directly in the first instance. For out of hours safeguarding concerns that do not require an immediate response as there is no immediate serious risk to a child, complete the Out of Hours Safeguarding referral form and send to CC-OOH-Safeguarding@cotswold-chine.org.uk

The Designated Safeguarding Lead will review the form within 24 hours and take appropriate action.

Although it is expected that any safeguarding concerns will normally be reported to the Designated Safeguarding Lead in the first instance, any member of staff can report the matter immediately using **Gloucestershire's Multi-agency Safeguarding Hub (MASH) number**, as follows:

- If the child is at risk of immediate harm, **Gloucestershire's MASH** can be contacted on **01452 426 565.**
- In other cases, a **qualified social worker** can be contacted for advice on **01452 426263.**

Annex 2

Post-18 Safeguarding Procedure

1. Although the School's policy in relation to safeguarding and protecting the welfare of those aged 18 or over (referred to as '*young adults*') is the same as it is in relation to children, the procedure that will be followed is different. In particular, the School will follow the guidance and reporting procedures set out in the *Gloucestershire Adult Safeguarding Policy and Procedures.*

2. One of the key differences when dealing with the safeguarding of young adults is that it is essential to consider whether they are capable of giving informed consent. If they are able, their consent will be sought. This may be in relation to whether they give consent to:

   - Any activity that may be considered abusive. However, if consent to abuse or neglect was given under duress (e.g. as a result of exploitation, pressure, fear, or intimidation), this apparent consent should be disregarded.

   - An adult safeguarding enquiry going ahead in response to a concern that has been raised. The individual must be given information and have the opportunity to consider all the risks and fully understand the likely consequences of that decision over the short and long term.

   - The recommendations of an individual safeguarding plan being put in place.

   - A medical examination.

   - An interview.

   - Certain decisions and actions taken during the adult safeguarding process with the person or with people who know about their abuse and its impact on the young adult.

Initial action

3. A member of staff suspecting or hearing of an allegation or disclosure of maltreatment of a young adult should take the same initial action as that set out in paragraph 3.4 of the School's Safeguarding Procedure. Further guidance can be found in the guidance published by GSAB - *Adult Safeguarding Concerns: Responding & Reporting*

Reporting

7.6 All allegations or disclosures of maltreatment (however trivial they may seem) must be reported to the relevant Designated Safeguarding Lead (i.e. to Hannah Dury if the allegation or disclosure is made in the education setting or to Eleanor Dall/Tim Makaruk if the allegation or disclosure is made in the residential care setting) as follows:

– *Concerns arising during normal working hours*: all concerns should be reported directly to the relevant Designated Safeguarding Lead by telephone on 01453 837171. In the absence of the relevant Designated Safeguarding Lead the matter should be reported to the Deputy Safeguarding Officer.

- *Concerns arising outside normal working hours*: If an urgent response is required because there is an immediate risk to the young adult then the out of hours line should be telephoned – 01453 837171. If there is no immediate serious risk to the young adult, the Out of Hours Safeguarding referral form must be completed and sent to CC-OOH-Safeguarding@cotswold-chine.org.uk

4. Whilst it is anticipated that any serious concerns about a young adult or allegations against staff members will normally be reported to the Designated Safeguarding Lead in the first instance, anyone can report the matter direct to external agencies as follows:

- Gloucestershire's Adult Social Care Help Desk on **01452 426 868**
- Emergency Duty Team (out of hours) on **01452 614 194**
- The Care Quality Commission on **03000 616 161**
- If a criminal offence has occurred or may occur, Gloucestershire Police can be contacted on **101**
- If a crime is in progress of life is at risk, contact the **Emergency Services on 999.**

Action by the Designated Safeguarding Lead

5. The action to be taken will take into account:

- The procedures published by the Gloucestershire Safeguarding Adults Board (GSAB).
- The views and wishes of the young adult involved. However, there may be times when the situation is so serious that decisions may need to be taken, after all appropriate consultation, that override a young adult's wishes. If the young adult is assessed to have mental capacity to reach a decision on the matter, their views will be respected unless this would be contrary to the public interest (e.g. because it would put others at risk) or because there is a duty of care on a particular agency to intervene (e.g. the police if a crime has been committed). In the event that a capacity assessment indicates that the young adult does not have mental capacity to make a decision on how the matter should be handled, the Designated Safeguarding Lead will carry out a further assessment in accordance with the Mental Capacity Act 2005 in order to determine what is in their best interests.
- The nature and seriousness of the incident, allegation, disclosure or suspicion. If there is room for doubt as to whether a referral should be made, the Designated

Safeguarding Lead may consult with the Adult Help Desk on a no-names basis without identifying the young adult.

Referrals to external agencies

6. Where a safeguarding concern is reported, the Designated Safeguarding Lead will carry out a risk assessment to ensure the safety of the individuals concerned and will liaise with the appropriate agencies in order to implement strategies, assist enquiries and contribute to any additional safeguarding measures. In the event that a criminal offence is suspected both the Police and the Adult Social Care Help Desk will be contacted.

Annex 3

Types and Signs of Maltreatment

1. Maltreatment can take many different forms including physical abuse, emotional abuse, sexual abuse, neglect, child sexual exploitation, female genital mutilation, trafficking, sexting, gender-based violence and faith abuse and these often overlap. Behaviours linked to issues such as drug taking and alcohol misuse, deliberately missing education and making or sharing of nude or semi-nude images and/or videos can be signs that children are at risk. Further information on the various types of maltreatment can be found in *Working Together to Safeguard Children (2026).* The following includes a summary of the types and signs of some of the most common types of maltreatment.

Abuse

2. Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as 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 if they see, hear, or experience the effects of abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

Physical abuse

What does it involve?	Possible indicators of abuse
A form of abuse which may involve the following: - hitting - shaking - throwing - poisoning - burning - scalding - drowning - suffocating - 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.	- unexplained injuries or burns - refusal to discuss injuries - improbable and inconsistent explanations of injuries - untreated injuries or lingering illness - admission of punishment which appears excessive - withdrawal from physical contact - fear of returning home or parents being contacted - fear of undressing - fear of medical help - aggression / bullying - over compliant behaviour - running away - significant changes in behaviour - deterioration in work

	- an unexplained pattern of absences.

Emotional abuse

What does it involve?	Possible indicators of abuse
The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve, include or feature: - conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. - not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. - Verbal abuse including persistent criticism, belittling and name calling - age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. - seeing or hearing the ill-treatment of another. - serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.	- continual self-deprecation - fear of new situations - inappropriate emotional responses to painful situations - self-harm or mutilation - compulsive stealing / scrounging - drug / solvent abuse - 'neurotic' behaviour (obsessive rocking, thumb sucking - 'air of detachment, don't care attitude' - social isolation - attention-seeking behaviour - eating problems - depression or withdrawal.

Sexual abuse

What does it involve?	Possible indicators of abuse
Forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve or include: - physical contact, including assault by penetration (for example, rape or penetration with an object) - non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. - non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. 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.	- bruises, scratches, burns or bite marks - scratches, abrasions or persistent infection in the anal or genital regions - pregnancy - sexually transmitted diseases - dislike of physical contact - lack of personal boundaries - inappropriate flirtatious talk to others - sexual awareness inappropriate to the child's age - frequent public masturbation - attempts to teach other children about sexual activity - refusing to stay with certain people or go to certain places - aggressiveness, anger, anxiety, tearfulness - withdrawal from friends.

Neglect

3. Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: (a) provide adequate food, clothing, and shelter (including exclusion from home or abandonment); (b) protect a child from physical and emotional harm or danger; (c) ensure adequate supervision (including the use of inadequate caregivers); (d) ensure access to appropriate medical care or treatment or (e) provide suitable education. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

4. *Signs of neglect*: Possible signs of neglect include (but are not limited to):

- the child says s/he has been neglected or says something which gives rise to that inference;
- the child's development is delayed;
- the child loses or gains weight; constant hunger;
- the child appears neglected, e.g. dirty, hungry, inadequately clothed;
- the child is reluctant to go home, or has been openly rejected by his/her parents or carers;
- the child regularly goes missing from school, home or care;
- the child suffers from poor mental health or engages in or talks about self-harming;
- there is no reasonable or consistent explanation for a child's injury; the injury is unusual in kind or location; there have been a number of injuries; there is a pattern to the injuries;
- the child's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour; or there is a sudden change in the child's behaviour.

Child Criminal Exploitation (CCE)

5. Different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. Child Criminal Exploitation (CCE) is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines) or forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim. Further information on County Lines can be found in the Home Office publication 'Criminal exploitation of children, young people, and vulnerable adults' (2023).

6. Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;

- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

7. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of CSE too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of CSE.

Child Sexual Exploitation (CSE)

8. Child Sexual Exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17-year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

9. The above CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant.

10. Further guidance has been published by the Department for Education: Child sexual exploitation: definition and guide for practitioners.

Female Genital Mutilation (FGM)

11. FGM includes procedures that intentionally alter or injure the female genital organs for non-medical reasons. FGM is sometimes known as 'female genital cutting' or female circumcision. Communities tend to use local names for this practice, including 'Sunna'.

12. Religion is sometimes given as a justification for FGM. For example, some people from Muslim communities argue that the Sunna (traditions or practices undertaken or approved by the prophet Mohammed) recommends that women undergo FGM. However, senior Muslim clerics have pronounced that FGM is not Islamic, and the London Central Mosque has spoken out against FGM on the grounds that it constitutes doing harm to oneself or to others, which is forbidden by Islam.

13. UK communities that are most at risk of FGM include Kenyan, Somali, Sudanese, Sierra Leoni, Egyptian, Nigerian and Eritrean, as well as non-African communities including Yemeni, Afghani, Kurdish, Indonesian and Pakistani. This is obviously not to say that all families from these communities practise FGM, and many parents will refuse to have their daughters subjected to this procedure. However, in some communities a great deal of pressure can be put on parents to follow what is seen as a cultural or religious practice.

14. The age at which girls undergo FGM varies enormously according to the community. The procedure may be carried out when the girl is newborn, during childhood or adolescence, at marriage or during the first pregnancy. However, the majority of cases of FGM are thought to take place between the ages of 5 and 8 and therefore girls within that age bracket are at a higher risk. It is believed that FGM happens to British girls in the UK as well as overseas (often in the family's country of origin). Girls of school age who are subjected to FGM overseas are thought to be taken abroad at the start of the school holidays, particularly in the summer holidays, in order for there to be sufficient time for her to recover before returning to her studies.

15. FGM is often carried out without any form of sedation and without sterile conditions. The girl or young woman is held down while the procedure of cutting takes place and survivors describe extreme pain, fear and feelings of abandonment. FGM is extremely harmful and is often described as brutal because of the way it is carried out, and its short and long term effects on physical and psychological health.

Risk factors of FGM

16. There are a number of factors in addition to a girl's community or country of origin that could increase the risk that she will be subjected to FGM:

- the position of the family and the level of integration within UK society – it is believed that communities less integrated into British society are more likely to carry out FGM;

- any girl born to a woman who has been subjected to FGM must be considered to be at risk of FGM, as must other female children in the extended family;

- any girl who has a sister who has already undergone FGM must be considered to be at risk of FGM, as must other female children in the extended family;

- any girl withdrawn from Personal, Social and Health Education may be at risk as a result of her parents wishing to keep her uninformed about her body and rights.

- There can also be clearer signs when FGM is imminent:
- it may be possible that families will practice FGM in the UK when a female family elder is around, particularly when she is visiting from a country of origin;
- a professional may hear reference to FGM in conversation, for example a girl may tell other children about it;
- a girl may confide that she is to have a 'special procedure' or to attend a special occasion to 'become a woman';
- a girl may request help from a teacher or another adult if she is aware or suspects that she is at immediate risk;
- parents state that they or a relative will take the child out of the country for a prolonged period;
- a girl may talk about a long holiday to her country of origin or another country where the practice is prevalent;
- parents seeking to withdraw their children from learning about FGM.

Signs of FGM

17. There are a number of indications that a girl has already been subjected to FGM:

- she may have difficulty walking, sitting or standing;
- she may spend longer than normal in the bathroom or toilet due to difficulties urinating;
- she may spend long periods of time away from a classroom during the day with bladder or menstrual problems;
- she may have frequent urinary or menstrual problems;
- here may be prolonged or repeated absences from school;
- a prolonged absence from school with noticeable behaviour change (e.g. withdrawal or depression) on the girl's return could be an indication that she has recently undergone FGM;
- she may be particularly reluctant to undergo normal medical examinations;
- she may confide in a professional; and/or
- she may ask for help but may not be explicit about the problem due to embarrassment or fear.

18. Members of teaching staff are under a legal duty personally to report to the police cases where they are informed by a girl under 18 that an act of FGM has been carried out on her or they observe physical signs which appear to show that an act of FGM has been carried out. It is recommended that the police report is made to the 101 number. Where there is a risk to life or a likelihood of serious immediate harm, professionals should report the case immediately to the police, using 999 if appropriate. Unless the teacher has a good reason not to, they should also report then matter to the Designated Safeguarding Lead for Education who will involve children's social care as appropriate. This duty does not apply in relation to 'at risk' or 'suspected' cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. However, in these cases, teachers should still report the matter to the Designated Safeguarding Lead for Education in accordance with the procedures set out in this policy.

19. Further information about FGM can be found in the *Multi-Agency Statutory Guidance on female genital mutilation*

Bullying

20. Bullying can be defined as using deliberately hurtful behaviour, usually over a period of time, where it is difficult for those bullied to defend themselves. The three main types of bullying are: physical bullying; verbal bullying (including cyber bullying); and emotional bullying.

21. All incidents of bullying should be dealt with by the class teacher or carer in the first instance, followed by the procedures in the Anti-Bullying Policy. All members of staff should be fully aware of and observe the provisions of the Anti-Bullying Policy.

Racist, Disability and Homophobic, Biphobic or Transphobic Abuse

22. The School challenges all incidents of racist, disability and homophobic, biphobic or transphobic abuse. The School recognises that hate crime is any criminal offence committed against a person or property that is motivated by hostility towards someone based on their: race, colour, ethnic origin, nationality or national origins; religion; gender or gender identity; sexual orientation; or disability.

23. All incidents of racist, disability and homophobic, biphobic or transphobic abuse should be dealt with by the class teacher or carer in the first instance and the procedures in the Anti-Discrimination Procedures should be followed. All members of staff should be fully aware of and observe the provisions of the School's Anti-Discriminatory Practice Policy.

Radicalisation and Extremism

24. The Prevent Strategy and associated Prevent Duty requires schools and care homes to train staff to recognise all forms of radicalisation in their respective communities. Radicalisation is a process by which an individual or group comes to adopt increasingly

extreme political, social, or religious ideals and aspirations that are fundamentally opposed to British values, namely democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and/or calls for the death of members of our armed forces, whether in this country or overseas.

25. Extremism is the promotion or advancement of an ideology based on violence, hatred, or intolerance that aims to: negate or destroy the fundamental right and freedoms of other or; undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or intentionally create a permissive environment for other to achieve the results above. There is no place for extremist views of any kind at the School, whether from internal sources (i.e. children, staff, or Trustees) or external sources (e.g. the school community, external agencies, or other individuals). Children should see the School as a safe place where they can explore controversial issues safely and where the teachers encourage and facilitate this – we have a duty to ensure this happens.

26. As a School we recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for children and so should be addressed as a safeguarding concern in accordance with this policy. We also recognise that if we fail to challenge extremist views, we are failing to protect our children.

27. The School recognises that radicalisation takes a wide range of forms and is not limited to the ISIL movement. It can include extremist views and action on animal rights, Neo-Nazism and Satanism to name but a few.

28. Extremists of all persuasions aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice and thereby limiting the life chances of children. Education is a powerful tool against this; equipping children with the knowledge, skills, and critical thinking, to challenge and debate in an informed way. We therefore will provide a broad and balanced curriculum, delivered by skilled professionals, so that our children are enriched, understand, and become tolerant of difference and diversity and also to ensure that they thrive, feel valued and not marginalised.

29. We are also aware that children may be susceptible to extremist ideology and radicalisation and be exposed to extremist influences or prejudiced views from an early age which emanate from a variety of sources and media, including via the internet, and at times children may themselves reflect or display views that may be discriminatory, prejudiced or extremist, including using derogatory language. Any prejudice, discrimination, or extremist views, including derogatory language, displayed by children will always be challenged and where appropriate dealt with in line with our Behavioural Support Policy. The expression of any such views or language by staff is contrary to the Staff Rules and Conduct contained in the Staff Handbook and will accordingly be dealt with under the Trust's disciplinary procedure.

30. As part of our wider safeguarding responsibilities staff should be alert to:

- disclosures by children of their exposure to the extremist actions, views or materials of others outside of school, such as in their homes or community groups, especially where children have not actively sought these out;
- graffiti symbols, writing or artwork promoting extremist messages or images;
- children accessing extremist material online, including through social networking sites;
- parental reports of changes in behaviour, friendship or actions and requests for assistance;
- partner schools, local authority services, and police reports of issues affecting children in other schools or settings;
- children voicing opinions drawn from extremist ideologies and narratives;
- use of extremist or 'hate' terms to exclude others or incite violence;
- intolerance of difference, whether secular or religious, or views based on characteristics such as gender, disability, sexual orientation, race, ethnicity or culture which are not in line with the School's equalities policy;
- attempts to impose extremist views or practices on others;
- anti-Western or anti-British views.

31. The School will closely follow the locally agreed procedure as set out by the Local Authority Safeguarding Children Partnership's agreed processes and criteria for safeguarding individuals vulnerable to extremism and radicalisation. In the event of concerns about a person becoming radicalised consideration will be given to using the Prevent Team based in Gloucestershire Constabulary. The Channel Panel is a bespoke panel which meets to address issues of individuals who have been identified as being at risk of radicalisation but have not committed any terrorism offence. The Panel meets when a referral has been made and referrals can be made by anyone. Further information can be found in Prevent duty guidance: England and Wales (2023), Making a referral to Prevent and The Prevent duty: an introduction for those with safeguarding responsibilities.

Gender-Based Violence / Domestic Abuse

32. Gender-based or domestic abuse is a range of abusive behaviours which can happen in an intimate relationship such as marriage, dating, family, or living together. This could also include intimate partner violence and child to parent or care giver abuse. The person on the receiving end of gender-based violence of domestic abuse can be male or female but, where there is an adult intimate relationship, many more women than men are the victims. It can also happen in gay or lesbian relationships. Violence against women has profound implications for health but is often ignored. This type of violence

is frequently invisible since it happens behind closed doors and legal systems and cultural norms may not treat it as a crime, but rather as a "private" family matter, or a normal part of life.

33. The School recognises that witnessing domestic abuse and/or gender-based violence is in itself a form of psychological and/or emotional abuse and must be reported through the School's safeguarding procedures.

34. Operation Encompass is an information sharing scheme between the Police and education setting which notifies when there has been a domestic abuse incident within the child's home. This allows for timely and informed support for children at school and ensures an up-to-date picture of the child's circumstances and support requirements.

Making or sharing of nude or semi-nude images and inappropriate use of new technologies

35. The School is committed to supporting children with the use of new technologies in a safe way, providing education around the risks.

36. The Trust has appointed a Child Exploitation Online Protection (CEOP) Ambassador and provides resources and materials to support teaching and care staff in their understanding of the risks surrounding new technologies including emerging 'apps' and the use of social networks. This also includes raising awareness of AI generated child sexual abuse images and videos.

37. Children complete an internet safety course before being given a web enabled device. Children are taught the dangers of sharing information online and how activities such as 'sexting' have serious implications and consequences. This is achieved through the school curriculum, one-to-one learning opportunities and group discussions.

38. Internet access is limited to a recognised safe list of websites through a robust firewall.

39. There is a monitoring system in place to check e-mails and interactions for inappropriate language or images that may be cause for concern.

Gangs and Youth Violence

40. Following the London riots in August 2011, the Government outlined a commitment to end Gang and Youth Violence through a joined up multi-agency approach.

41. Children in our care are particularly vulnerable to being easily led and it is important to educate our children in both the care home and in formal education of the safety risks attached to being in gangs. Though the School is in a remote rural area and benefits from there being little or no gang activity at any time, we must recognise and respond to all forms of gang activity that children may disclose when they arrive back from a weekend at home, for example.

42. The School can make use of the Avenger Task Force as a new initiative led by police, set to revolutionise the approach to gangs in Gloucester. The multi-agency project, involving representatives from Gloucestershire Constabulary, Gloucestershire City Council and Gloucestershire County Council's Youth Support Team, aims to reduce the number of youngsters involved in gangs by offering support to those who are or may be vulnerable.

Teenage Relationship Abuse

43. Research has shown that some teenagers have worryingly high levels of acceptance of abuse within relationships and often justify the abuse with the actions of the victim, e.g. because they were unfaithful. Most commonly reported forms of emotional abuse, irrespective of gender, were 'being made fun of' and 'constantly being checked up on by partner'. Girls were more likely than boys to say that the abuse was repeated and that it either remained at the same level of severity, or worsened, especially after the end of the relationship. Younger participants (aged 13 to 15 years old) were as likely as older adolescents (aged 16 and over) to experience some forms of relationship abuse.

44. The School recognizes the increasing prevalence of non-fatal strangulation within intimate teenage relationships. It is often used as a form of control, intimidation and violence but also a belief around its use in increasing sexual arousal. This is often called 'choking' and involves putting pressure on someone's neck in a way that restricts breathing or blood flow to the brain. Non-fatal strangulation is dangerous and appears to be becoming more common in young people's sexual relationships with the belief that this is a normal part of sex. Young people are supported with their knowledge around this and that they cannot consent to the serious harm that this behaviour may bring.

45. The School has embraced and implemented the PinK (People in the Know) Curriculum developed in Gloucestershire to educate children on appropriate and safe relationships through a structured daily PSHE curriculum.

Children who are lesbian, gay, bi, or trans (LGBTQ+)

46. The School recognises that children who are LGBTQ+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+. Risks can be compounded where children who are LGBTQ+ lack a trusted adult with whom they can be open. When supporting a gender questioning child, the school takes a cautious approach and considers the individual needs of the child. At the School the staff endeavour to reduce the additional barriers faced, use professional curiosity and provide a safe space and create a culture where they can speak out or share their concerns with members of staff. The School's Relationships Education, Relationship and Sex Education and Health Education curriculum use focussed sessions and resources to counter homophobic, biphobic and transphobic bullying and abuse.

Sexual violence

47. Children can, and sometimes do, abuse their peers through sexual violence. For the purpose of the School's policy, sexual violence means sexual offences under the Sexual Offences Act 2003, as follows:

- Rape - a person (A) commits an offence of rape if: (a) he intentionally penetrates the vagina, anus, or mouth of another person (B) with his penis; (b) B does not consent to the penetration; and (c) A does not reasonably believe that B consents.

- Assault by Penetration - a person (A) commits an offence if: (a) he or she intentionally penetrates the vagina or anus of another person (B) with a part of her or his body or anything else; (b) the penetration is sexual; (c) B does not consent to the penetration; and (d) A does not reasonably believe that B consents.

- Sexual Assault - a person (A) commits an offence of sexual assault if: (a) he or she intentionally touches another person (B); (b) the touching is sexual; (c) B does not consent to the touching; and (d) A does not reasonably believe that B consents.

48. What is consent? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another (e.g.: to vaginal but not anal sex or penetration with conditions, such as wearing a condom). Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if he or she agrees by choice to that penetration and has the freedom and capacity to make that choice. For these purposes:

- a child under the age of 13 can never consent to any sexual activity;

- the age of consent is 16;

- sexual intercourse without consent is rape.

Sexual harassment

49. Sexual harassment refers to 'unwanted conduct of a sexual nature' and can occur online and offline. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

50. Sexual harassment can include (but is not necessarily limited to):

- sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, and calling someone sexualised names.

- sexual "jokes" or taunting.

- physical behaviour such as deliberately brushing against someone, interfering with someone's clothes (depending on the experience of the victim this could also constitute sexual violence) and displaying pictures, photos, or drawings of a sexual nature.

- online sexual harassment (see below).

- Upskirting - The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or to cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender can be a victim.

51. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

- non-consensual or consensual sharing of sexual images and videos.

- sexualised online bullying.

- unwanted sexual comments and messages, including, on social media; and

- sexual exploitation and/or coercion and threats.

52. Sexual harassment creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

Harmful sexual behaviour

53. Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term which has been widely adopted in child protection is "harmful sexual behaviour". Harmful sexual behaviour can occur online and/or offline (physically and verbally) and can also occur simultaneously between the two, through a group of children towards a single child or towards another group of children.

54. When considering harmful sexual behaviour, ages and the stages of development of the children are critical factors to consider. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. See *NSPCC: Harmful Sexual Behaviour* for more information on what harmful sexual behaviour is.

Advice on typical sexual development and behaviour or different age groups can be found here: *Sexual development and behaviour in children – NSPCC Learning.*

55. Harmful sexual behaviour can, in some cases, progress on a continuum, and may escalate into sexual harassment or sexual violence. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying harmful sexual behaviour have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

56. When assessing Harmful Sexual Behaviour, both chronological and developmental age must be considered as well as any power dynamic displayed in the incident e.g. physical size or abuse due to a disability. The School recognizes the importance of a swift, knowledgeable and skilled response to any incidents of Harmful Sexual Behaviour. Members of the Safeguarding team are trained in the Assessment, Intervention and Moving On (AIM) programme which allows them to assess, identify, respond to and manage concerns around harmful sexual behaviour.

Forced Marriage, Honour Based Violence and Faith Abuse

57. There is a need to identify and challenge certain kinds of child abuse linked to faith or belief. This can include belief in witchcraft, spirit possession, demons or the devil, the evil eye or djinns, dakini, kindoki, ritual or multi murders and use of fear of the supernatural to make children comply with being trafficked for domestic slavery or sexual exploitation. The beliefs which are the focus of this abuse are not confined to one faith, nationality or ethnic community.

58. Abuse can take place within cultures or faith contexts in general, for example female genital mutilation or forced marriage. Child abuse is now recognised to have been prevalent in faith settings, for example, sexual abuse by paedophiles in a religious community.

59. Forced marriage is one entered into without full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). It is also a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday even if violence, threats or another form of coercion are not used.

60. The terms “honour crime” or “honour-based abuse” or “izzat” embrace a variety of crimes of violence (mainly but not exclusively against women), including assault, imprisonment and murder where the person is being punished by their family or their community. The victim is often punished for actually, or allegedly, undermining what the family or community believes to be the correct code of behaviour. In transgressing this correct code of behaviour, the person shows that they have not been properly controlled to conform by their family and this is to the “shame” or “dishonour” of the

family. It can be distinguished from other forms of abuse, as it is often committed with some degree of approval and/or collusion from family and/ community members. Victims may have multiple perpetrators not only in the UK. Honour based abuse can be a precursor to a forced marriage.

Private Fostering

61. A private fostering arrangement is essentially one that is made privately (that is to say without the involvement of a local authority) for the care of a child under the age of 16 (or under 18 if the child is disabled) by someone other than a parent or close relative with the intention that it should last for 28 days or more (continuity is not broken by the occasional short break). A private fostering arrangement is only legitimate if the parent has given informed consent and Social Services know about, and agree with, the arrangement.

62. Private fostering is among the least controlled and most open to abuse of all the environments in which children live away from home and staff at the School need to recognise and respond should there be suspicions that this is the case. Any member of staff who suspects that a child may be subject to a private fostering arrangement should notify one of the Designated Safeguarding Leads who will liaise with the relevant local authority.

History of amendments (from August 2020)

Date	Summary of amendment	Inserted by
1 August 2020	1. Update to include Daniel Blackwell as new Deputy Designated Safeguarding Officer for Residential Care. 2. Updated COVID-19 amendments integrated into the existing policy in Annex 4; • Changed Kelly L (Designated Safeguarding Lead) is no longer working remotely. • Changed to include more meetings taking place in groups with social distancing measures in place.	KL (DSL)
1 September 2020	1. Updated to include Hannah Dury as new Deputy Designated Safeguarding Officer for Education. 2. Updated with reference to Keeping Children Safe in Education 2020; • Added both mental and physical health to the definition of safeguarding. • Contextual safeguarding explanation expanded • In relation to allegations made against staff additional bullet point added around 'transferable risk'. • Added section on CSE and CCE. • Mental Health section added. 3. Annex 3; • CCE, CSE, Upskirting, Domestic Violence, honour-based abuse and preventing radicalization are all updated with additional explanations.	KL (DSL)
1 September 2021	1. Added information regarding whole school approach to promote a safeguarding culture. 2. Updated links to latest guidance Keeping Children Safe in Education 2021 and Sexual violence and harassment between children in schools and colleges 2021. 3. Amended Gloucestershire safeguarding children referral contact numbers according to Gloucestershire's safeguarding Children Partnership procedures online. 4. Included section on record keeping. 5. Update staff training and support regarding staff behaviours and conduct 6. Update information regarding child disclosure on sexual abuse to include section on reassuring child who makes a disclosure to prevent feelings of shame and promote a sense of safety. 7. Added more details to mental health section.	KL (DSL)

	8. Updated CCE and CSE definitions according to new guidance 9. Peer on peer abuse section updated to include behaviours this may link to. 10. Change of language from 'sexting' to sharing of nudes and semi-nudes'. 11. Added additional information on risk factors for serious crime section. 12. Updated Designated Safeguarding Lead names to change Tim Makaruk to Hannah Dury and add Lucy Jones for Deputy Safeguarding Lead in Education. 13. Extra information added to CSE and CCE section. 14. Added section on procedure for managing lower-level concerns for staff behaviours and conduct. 15. Eleanor Dall added to policy as Deputy Safeguarding Officer.	
September 2022	1. Changed references to Keeping Children Safe in Education 2022. 2. Added statement to update definition of safeguarding and promoting the welfare of children. 3. Changed Designated Safeguarding Lead (Care) to Carolyn Cornwall and Dan Walton added as Trustee with responsibility for safeguarding. 4. Added paragraph regarding how children may not be ready to talk about their experiences. 5. Education and awareness for children section added. 6. Updated contextual safeguarding section in line with KCSIE 2022 7. Removed COVID 19 annex 4 amendment. Moved section regarding Video calling with children, families, and professionals. 8. Annex 3 updated definition of abuse. 9. Updated FGM reporting procedure. 10. Added new section on Considering confidentiality and anonymity. 11. Reviews of online safety arrangements amended. 12. Added section on children who are lesbian, gay, bi, or trans (LGBT).	KL (DSL)
November 2022	1. Changed Acting Designated Safeguarding Lead (Care) to Eleanor Dall.	MR
September 2023	1. Changed references to Keeping Children Safe in Education 2023.	ED (DSL)

	2. Changed Designated Safeguarding Lead (Care) to Eleanor Dall. 3. Further information added about 'children who are absent from education' and language change from 'children missing education'. 4. Added link to guidance around 'multi-agency practice principles for responding to child exploitation and extra-familial harm' to Contextual Safeguarding section. 5. Further information and clarification about filtering and monitoring systems and processes in place at the school. 6. Added link to 'Meeting digital and technology standards in schools and colleges'. 7. Link added to new guidance 'The Prevent Duty: Safeguarding learners vulnerable to radicalization'. 8. Updated information about Forced marriage law change. 9. Added statement on organizations or individuals using school premises and the management of allegations.	
December 2023	1. Changed references to updated guidance Working Together to Safeguard Children (December 2023)	ED (DSL)
September 2024	1. Changed references to Keeping Children Safe in Education 2024. 2. Added link to new 'Information sharing guidance for practitioners' (2024). 3. Update to Early Help identifiers. 4. Sarah Day added to policy as Deputy Safeguarding Officer for Care. 5. Added link to guidance about when to contact the Police. 6. Information added to refer to AI-generated child sexual abuse images and videos. 7. Update to information sharing and GDPR statement. 8. Update around terminology and wording of definition of domestic abuse. 9. Added link for further information from the Home Office about County Lines. 10. Updated definition of Extremism. 11. Further information added about 'gender questioning children'.	ED (DSL)
November 2024	1. Changed Designated Safeguarding Lead (Care) to Valerie Gomez and Tim Makaruk	MR
March 2025	1. Changed Designated Safeguarding Lead (Care) to Eleanor Dall 2. Changed Deputy Safeguarding Officer (Care) to Tim Makaruk. 3. Sarah Day and Valerie Gomez (previously Deputy	ED (DSL)

	Safeguarding Officers for Care) removed from the policy.	
September 2025	1. Changed Designated Safeguarding Lead (Care) to Tim Makaruk and Emma Milner. 2. Changed references to Keeping Children Safe in Education 2025 3. Update to the list of harms that children may experience online with the addition of misinformation, disinformation and conspiracy theories. 4. Added link to guidance on Generative artificial intelligence (AI) in education 2025. 5. Added link to statutory guidance Working together to improve school attendance (2024).	ED (DSL)
April 2026	1. Changed Designated Safeguarding Leads (Care) to Eleanor Dall and Tim Makaruk. 2. Jenny Hook and Chas Earley added to the policy as Deputy Safeguarding Officers for Care. 3. Changed references to Working Together to Safeguard Children 2026. 4. Clarified information on child-on-child abuse is able to occur between any children of any gender.	ED (DSL)
September 2026	1. Changed references to Keeping Children Safe in Education 2026 2. Updated reference to Community based Early Help and targeted Family Help 3. Reference to Annex B amended 4. Replaced “indecent” and “sexting or youth produced imagery” with “making or sharing of nudes and semi-nudes”. 5. Update that “assault by penetration” includes with an object 6. Addition of examples of issues staff should remain alert to 7. Updated definition of abuse to include child to parent or care give abuse 8. Update to child-on-child abuse that this also includes serious physical harm or treats involving weapons 9. Information added to Mental Health section 10. Information added to Serious Violence section 11. Added link to Data (Use and Access) Act 2025 12. Added updated information about online safety categories 13. Additional references to Trainee Teachers throughout policy, where relevant 14. Updated information to Harmful Sexual Behaviour section with added link to NSPCC Learning on Sexual Development and Behaviour in children 15. Added link to Cyber Crime and link to Cyber Choices.	ED (DSL)

	16. Added section on non-fatal strangulation in teenage relationships. 17. Added Becky Kent as Deputy Safeguarding Officer for Education 18. Added additional paragraph to clarify the process for dealing with allegations against staff members	