

POLICY DOCUMENT

SAFEGUARDING POLICY AND CHILD PROTECTION PROCEDURES



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Hipperholme Grammar School Safeguarding Policy and Child Protection Procedures 2026-27.

The Head of Foundation is Sarah Weller.

This policy was signed off by the Governing Body on 24th September 2026.

Policy Statement

This policy has been authorised by the Governors, is addressed to all members of staff and volunteers in The Foundation, is available to parents on request and is published on the School website. It is written using all statutory guidance and the expertise and experience of staff and governors. It applies wherever staff or volunteers are working with pupils even where this is away from the School, for example at an activity centre or on an educational visit. This Policy also applies to staff and volunteers operating within our EYFS setting. The School works closely with the local authority and contributes to inter-agency working on individual cases and training. The School's address places it within Calderdale authority although pupils, parents, staff and governors may live in another authority. In discussion with these authorities it is Calderdale who will be the first contact for the School on any referral or allegation. The level at which a referral meets the threshold for an investigation will be decided by the partnership and is covered in Designated Safeguarding Lead (DSL) training.

HOWEVER, ANY MEMBER OF STAFF CAN MAKE A DIRECT REFERRAL TO SSD. Should the case involve a pupil, parent, member of staff or governor whose home address is not within Calderdale we will take advice from Calderdale Safeguarding Children Board as to whether the case should be referred to an alternative authority. This policy should be used in conjunction with the School's Staff Induction Policy, Anti Bullying Strategy including how to keep safe online as well as the Policy on Data Protection which includes details on online protection, as appropriate. (See <http://www.hgsf.org.uk/about/policies/>)

The DSL has lead responsibility for all child protection and safeguarding within the School, which includes online safety. The role also encompasses ensuring that all staff understand the symptoms of child abuse and neglect, that any concerns are referred. They are also responsible for monitoring children who are the subject of child protection plans and maintaining accurate and secure child protection records.

The DSL for the whole school is Sarah Weller, Head of Foundation, who can be contacted on 01422 202256.

The Deputy DSLs for the Foundation are:

Mrs Emma Beardall, Assistant Head (Pastoral)

Mrs Jo Ford, Assistant Head (Academic)

Mrs Angharad Garner, Pastoral Lead (Juniors)

Mrs Diane Butcher (Early Years)

Ms Rebecca Lord

All can be contacted on 01422 202256.

Should none of the above named DSLs be available please contact the Designated Governor except in circumstances where they are the subject of an allegation (see section of this policy on allegations against staff).

The Designated Governor for Safeguarding is Mrs Jackie Griffiths, who can be contacted via the School on 01422 202256 (and asking the Office Staff to pass on the caller's contact details), by writing to the School marking an envelope 'Private and Confidential' or by contacting her directly via email j.d.griffiths@hgsf.org.uk

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Introduction

The policy reflects Calderdale local safeguarding partnership arrangements and in line with:

- [Calderdale Safeguarding Children Partnership Policies and Procedures](#)
- [West Yorkshire Consortium Inter Agency Safeguarding and Child Protection Procedures](#)
- [Working Together to Safeguard Children \(2026\)](#)
- [Keeping Children Safe in Education \(2026\)](#)

- [Children's Wellbeing and Schools Act 2026](#)
- [Early Years Foundation Stage \(EYFS\) Statutory Framework 2026](#)
- [Information Sharing \(2024\)](#)
- [What to do if you are worried a child is being abused \(2015\)](#)
- [Children Act 1989](#) and [Children Act 2004](#)
- [Education Act 2002](#)
- [Teaching Standards \(updated Dec 2021\)](#)
- [Guidance for Safer Working Practice for those working with Children and Young People in Education Settings \(SR Consortium Feb 2022\)](#)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people \(2024\)](#)
- [Children Missing Education - Statutory Guidance 2025](#)
- [Alternative Provision - Statutory Guidance 2025](#)
- [Behaviour in Schools - Advice for headteachers and school staff - February 2024](#)
- [Searching, Screening and Confiscation - Advice to Schools July 2022](#)
- [Out-of-school settings: safeguarding guidance for providers 2026](#)
- [Meeting digital and technology standards in schools and colleges - updated June 2026](#)
- [DfE Education for children with health needs who cannot attend school 2023](#)

Safeguarding and promoting the welfare of children is defined as:

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

(Working Together to Safeguard Children, 2026)
(Keeping Children Safe in Education, 2026)

The term “Child” or “Children” refers to as anyone under the age of 18 years

We believe that:

- Schools play a key role in the prevention of abuse, neglect and exploitation.
- All children have the right to be protected from harm.

Children need support which matches their individual needs, including those who may have experienced abuse, neglect or exploitation.

Section 1 School Commitment, including Equality and Human Rights

This policy applies to all adults, including volunteers, working in or on behalf of the school.

The school considers it essential that everybody working in our school understands their safeguarding responsibilities.

The purpose of this policy is:

- to inform staff, parents, volunteers and governors about the school’s responsibility for safeguarding children and to develop awareness and identification of abuse, neglect and exploitation.
- to establish and maintain an environment where children feel safe, can learn, and are encouraged to talk and are listened to.

Everyone working in or for our school shares an objective to help keep children and young people safe by:

- reading and understanding Part 1 of Keeping Children Safe in Education 2026 (or Annex A as directed by the school senior leadership team*)
- providing a safe environment for children and young people to learn and develop in our school setting, and identifying children and young people who are suffering or likely to suffer significant harm at the earliest opportunity, and taking appropriate action with the aim of making sure they are kept safe both at home and in our school setting.

Our school leaders and governing body promote a whole school approach to safeguarding pupils, ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development with the best interests of the child at their heart. There is a focus around ensuring the child’s wishes and feelings are taken into account when determining what action should be taken following the raising of any safeguarding concern.

The school ensures this policy and procedures document will be reviewed on an annual basis to reflect changes in national and local guidance.

Hipperholme Grammar School is committed to safeguarding and promoting the well being of all of its pupils. Each pupil's welfare is of paramount importance. We recognise that some children *may* be especially vulnerable to abuse or exploitation, especially those with identified special educational needs and/or a disability (SEND). We recognise that children who are abused, neglected or exploited may find it difficult to develop a sense of self worth and to view the world in a positive way. Whilst at school, their behaviour may be challenging. We recognise that some children who have experienced abuse may harm others. We will always take a considered and sensitive approach in order that we can support all of our pupils. The diagram below indicates what we consider under the umbrella of safeguarding and indicates some of the other policies that relate to safeguarding. The school ensures that all policies are cross-referenced and reviewed annually. All policies are available to staff, and a register is kept and signed by staff as evidence that they have read, understood and thus agreed to adhere to any policies.

**Annex A: Safeguarding information for school and college staff, is a condensed version of KCSIE Part One. It can be provided (instead of Part One) to those staff who do not directly work with children, if the governing body thinks it will provide a better basis for those staff to promote the welfare and safeguard children.*



Equality legislation

The guidance sets out the significance of the [Equality Act 2010](#) to school safeguarding, including that schools and colleges:

- must not unlawfully discriminate against pupils because of their protected characteristics
- must consider how they are supporting pupils with protected characteristics
- must take positive action, where proportionate, to deal with the disadvantages

these pupils face. For example, by making reasonable adjustments for disabled children and supporting girls if there is evidence they are being disproportionately subjected to sexual violence or harassment.

Human Rights Act

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them.

Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific Convention rights applying to schools and colleges are:

Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)

Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity.

Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, and Protocol 1, Article 2: protects the right to education.

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Further information (including on absolute and qualified rights) can be found at Human Rights - [Equality and Human Rights Commission](#).

Section 2 Providing a Safe and Supportive Environment

2.1 Safer Recruitment and Selection

The school pays full regard to DfE guidance 'Keeping Children Safe in Education' (KCSIE) 2026.

We ensure that all appropriate measures are applied in relation to everyone who works in the school, who is likely to be perceived by the children as a safe and trustworthy adult including e.g. volunteers and staff employed by contractors.

Safer recruitment practice as laid out in KCSIE 2026 Part 3, is adhered to in terms of scrutinising applicants and the undertaking of all pre-employment vetting checks, appropriate to the role and the level required for that role.

This school is committed to keeping an up to date Single Central Record (SCR) which covers the following people:

- all staff, including teacher trainees, agency and third party supply staff who work at the school;
- all members of the school governing body;
- all others who work in regular contact with children in the school, including volunteers; and
- all members of the proprietor body.

The Single Central Record (SCR) records the safer recruitment checks and states whether the checks have been carried out or certificates obtained, the date on which the checks were completed and by whom.

If we have staff from an agency or third-party organisation, we will obtain written notification from that agency or organisation that they have carried out the checks, and we will ensure that we check the identification of the person presenting themselves for work and that this is the same person on whom the checks have been made.

Victoria Wheeler
Sarah Weller

Business Manager
Head of Foundation

The above people have undertaken appropriate safer recruitment training within the last 3 years, sufficient to cover Part 3 of Keeping Children Safe in Education 2026, and at least one of the above will be involved in all staff and volunteer appointments and arrangements (including, where appropriate, contracted services). More details are given in the Staff Recruitment Policy.

Home-stays (Exchange Visits)

Where children from overseas are staying with UK parents as part of an exchange organised by the school, those parents will be deemed to be in 'Regulated Activity' for the duration of the stay and as such will be required to submit to an enhanced DBS check including barring check. As a volunteer, all checks will be processed free of charge by the DBS. Where additional people in the host family are aged over 16 (i.e. elder siblings) the school will consider on a case by case risk assessment basis whether such checks are necessary.

2.2 Safe Working Practice

The Teaching Standards (Updated December 2021) state that teachers, including head teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties. All staff who work within our school are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.

In accordance with the Safer Working Practice Consortium's 'Guidance for Safer Working Practice for those with Children and Young People in Education Settings' (February 2022)

and linked to our Staff Behaviour Policy (Code of Conduct) and Whistleblowing Policy; safe working practices in our school ensure that pupils are safe and that all staff:

- understand their responsibilities to safeguard and promote the welfare of pupils;
- are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions;
- should work, and be seen to work in an open and transparent way including self-reporting if their conduct or behaviour falls short of these guiding principles;
- should acknowledge that deliberately invented/malicious allegations are rare and that all concerns should be reported and recorded;
- should apply the same professional standards regardless of culture, disability, gender, language, racial origin, religious belief and sexual orientation;
- should not consume or be under the influence of alcohol or any other substance, including prescribed medication, which may affect their ability to care for children;
- should be aware that breaches of the law and other professional guidelines could result in disciplinary action being taken against them, criminal action and/or other proceedings including barring by the Disclosure and Barring Service (DBS) from working in regulated activity, or for acts of serious misconduct, prohibition from teaching by the Teaching Regulation Agency (TRA);
- should continually monitor and review practice to ensure this guidance is followed;
- should be aware of and understand the school/college safeguarding policy and child protection procedures including arrangements for managing allegations against staff, staff behaviour policy, whistleblowing procedures and the procedures of the local safeguarding children partnership.

Whistleblowing is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion.

No disciplinary action will be taken against any member of staff who acts in good faith in reporting concerns about a colleague. If the staff member or volunteer feels unable to raise a concern within school, or feels that their genuine concerns are not being addressed or taken seriously they can contact the [NSPCC Whistleblowing Helpline](https://www.nspcc.org.uk/what-we-do/our-services/whistleblowing-helpline/) (0800 028 0285: 8.00am - 8.00pm Mon to Fri; email address: help@nspcc.org.uk).

2.3 Risk Assessments

Risk assessments are taken seriously and used to good effect to promote safety. Risk assessments are available for all aspects of the school's work (*such as premises and equipment, on-site activities, off-site activities, venues used, transport*). Where relevant, risk assessments are carried out for individual pupils, and supported by action plans identifying how potential risks would be managed.

Individual risk assessments are also used when deciding a response to a child demonstrating potentially harmful behaviour such as sexually harmful behaviour or when identifying whether a child who may be particularly vulnerable, such as a child at risk of Child Criminal Exploitation.

2.4 Safeguarding Information for pupils

All pupils in our school are aware of a number of staff who they can talk to. The school is committed to ensuring that pupils are aware of behaviour towards them that is not acceptable and how they can keep themselves safe. We aim for all pupils to know that we have a Designated Safeguarding Lead (DSL), who is a senior member of staff with responsibility for child protection. Likewise pupils are informed that there is/are a Deputy DSL(s) who they would talk to if the DSL was not in school. We inform pupils of whom they might talk to, both in and out of school, their right to be listened to and heard and what steps can be taken to protect them from harm.

Pupils in our school are treated with dignity and respect and their views are listened to. School's arrangements for consulting with and listening to pupils are via form tutors, school council, PSHE lessons and assemblies. We make pupils aware of these arrangements by posters, form time and assemblies.

Safeguarding is a priority which is reflected in the curriculum, which is used to promote safeguarding and is tailored to local concerns.

Children are taught to be safe through full school assemblies, section assemblies, form time, PSHE and whenever an issue arises. This includes specific references to pupils and parents.

2.5 Partnership with Parents

The school shares a purpose with parents to educate and keep children safe from harm.

We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' rights to privacy and confidentiality and will not share safeguarding related information, unless we have permission to do so, or it is necessary to fulfil our Statutory Information Sharing Duty (see section 2.6).

Hipperholme Grammar School will share with parents or those persons with parental responsibility, any concerns we may have about their child unless to do so may place a child at increased risk of harm.

Hipperholme Grammar School's DSLs may consult with Calderdale Children's Social Care, Multi-Agency Screening Team (MAST) where safeguarding concerns arise that require the advice or guidance from other safeguarding professionals.

We encourage parents to discuss any concerns they may have with the school and we encourage parental feedback to the school on safeguarding concerns. We make parents aware of our policy on the website and parents know that this policy and others are

accessible at all times via the school website. Posters and displays also ensure that safeguarding has a high profile within the whole school community.

We keep parents up to date with our safeguarding curriculum by newsletter and the website.

2.6 Partnerships with others and Statutory Information Sharing Duty

Schools and education providers hold vital information that helps identify need at the earliest opportunity. Sharing of information helps in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

The Children's Wellbeing and Schools Act 2026 introduced a statutory information sharing duty on schools to share safeguarding related data and information with Children's Social Care, the Police and Health agencies where safeguarding concerns arise that require the advice or guidance from other safeguarding professionals.

Limitations to this duty may be triggered in circumstances where:

- a child is placed at risk of significant harm as a result of information being shared
- interfering with a police operation
- contravention of procedures in the Family Court

Details of any information sharing undertaken, will be recorded in the child's safeguarding file.

Further detail can be found in the following HM Govt guidance: Information sharing - advice for practitioners.

As a school we will cooperate with Social Care where they are conducting child protection enquiries. Furthermore, school will endeavour to attend appropriate multi-agency meetings such as Early Intervention Panels, Early Help Pathways, Team Around the Child meetings, Child In Need reviews, Initial and Review Child Protection Case Conferences, and Children Looked After (CLA) reviews. We will provide written reports as required for these meetings and, wherever possible, these reports will be shared with parents prior to the meetings. We appreciate that attendance and contribution to these meetings may require key members of staff to be contactable and available during school holidays.

Where partner agencies such as the police and/or social care attend school to conduct enquiries under section 47 of The Children Act 1989, staff will inform the Head of Foundation as to the nature of the enquiries. Consideration will always be given to the requirement for children to have an Appropriate Adult present. Further information can be found in the DfE guidance: [Searching, Screening and Confiscation - Advice to schools July 2022](#).

2.7 School Training and Staff Induction

Following successful completion of Initial Designated Safeguarding Lead (DSL) training, the school's DSL and any person undertaking the role of Deputy DSL undertakes refresher training at 2 yearly intervals, provided by Calderdale Council's Schools Safeguarding Service. The DSLs also attend other opportunities such as the DSL Network events to ensure that they are up to date with current practices and procedures and in order to further their continuous professional development.

The Head of Foundation and all other school staff, including non teaching staff and volunteers, undertake appropriate induction training to equip them to carry out their responsibilities for child protection effectively, which is kept up to date by refresher training in Basic/Foundation Safeguarding Awareness on an annual basis. The school ensures that this takes place by the DSL providing annual updates through face-to-face delivery or by coordinating online training.

All staff (including temporary staff and volunteers) are directed to the Staff Drive /school website for an electronic copy and a paper copy is available of the school's safeguarding policy and child protection procedures. All staff sign a register to say that they have received, read and understood the policy. At annual INSET in September (or when a new member of staff joins the School) all staff are required to read, then sign to say they have understood KCSIE Part 1 or Annex A and Annex B if working directly with children. Ensure that all staff have regular child protection training, including online safety. This includes training staff how to recognise, listen to allegations and report child on child sexual violence and sexual harassment.

In line with KCSIE 2026, all staff upon induction will also receive:

- copy of the school's Safeguarding Policy and Child Protection Procedures
- copy of the school's behaviour policy
- copy of the staff code of conduct/staff handbook
- copy of the school's safeguarding response for managing children who are absent from education on repeat occasions and/or prolonged periods
- copy of KCSIE 2026 Part One

2.8 Support, Guidance and Supervision for Staff

Staff will be supported by Hipperholme Grammar School, the Local Authority and professional associations.

The Designated Safeguarding Lead and Deputy Safeguarding Lead for Safeguarding/Child Protection will be supported by the governing body. Advice is available from the Schools Safeguarding Advisor from the Local Authority, Steve Barnes and Frances Turner - Advisors from the Local Authority.

It is recognised that staff should receive regular safeguarding supervision and support if they are working directly and regularly with children whose safety and welfare are at risk,

and therefore the Designated Safeguarding Lead and the Deputy Designated Safeguarding Lead have weekly meetings and the DSLs attend termly Calderdale Hub Meetings.

Safeguarding is also an agenda item for relevant meetings eg. staff meetings and governors' meetings. Therefore there is an opportunity for discussion and to raise concerns regularly throughout the year.

Monitoring

The Designated Safeguarding Lead will monitor the operation of this policy and its procedures and report to the Head of Foundation.

The Governors will undertake an annual review of this policy and how their duties under it have been discharged.

The Governors will ensure that any deficiencies or weaknesses in regard to child protection arrangements are remedied without delay

Electronic devices in EYFS

Staff, parents and children are not permitted to use any personal electronic devices, including mobile phones or other devices with image and sharing capabilities, when around or within the vicinity of the early years lodge. Only school devices will be used by staff to take photographs of the early years children.

2.9 Alternative Provision including Work Placements

Alternative provision refers to education arranged by schools or local authorities for pupils who, due to exclusion, illness, or other reasons, cannot attend the school they are registered at. It may include placements in pupil referral units (PRUs), vocational training centres, FE colleges, or other approved providers.

Our school maintains responsibility for safeguarding our pupils in any such alternative provision, for any period of time.

We ensure that all AP providers have appropriate safeguarding policies and procedures in place and secure written confirmation from providers, that staff at AP settings have undergone relevant safeguarding training and have been subject to all appropriate safeguarding checks, i.e. those checks that school would otherwise perform in respect of our own staff.

We maintain regular contact with AP providers to monitor pupil attendance, engagement, and wellbeing. This includes contextual safeguarding considerations when assessing risks in AP placements. (See Sect 3.12)

When organising work placements, the school is committed to ensuring that all placements are safe, appropriate, and supportive of pupil wellbeing and development,

and ensure that the placement provider has policies and procedures in place to safeguard pupils.

[Alternative Provision - Statutory Guidance Updated Feb 2025 \(hyperlink to document\)](#)

[Education for children with health needs who cannot attend school](#)

[GOV.UK](#)

<https://www.gov.uk> > [government](#) > [publications](#) > [edu...](#)

Section 3 Ensuring that Children are Safe at School and at Home

3.1 Child Abuse, Neglect and Exploitation

Teachers and other adults in school are well placed to observe any physical, emotional or behavioural signs which indicate that a child may be suffering significant harm. Common signs include unexplained changes in behaviour or personality, becoming withdrawn or anxious, becoming uncharacteristically aggressive, lacking social skills or having few friends, knowledge of adult issues inappropriate for the child's age, poor bond or relationship with a parent, running away or going missing, always choosing to wear clothes which cover their body. The relationships between staff, pupils, parents and the public which foster respect, confidence and trust can lead to disclosures of abuse, and/or school staff being alerted to concerns.

Definitions:

(‘Working Together’ 2026 and ‘Keeping Children Safe in Education’ 2026)

A child: any person under the age of 18 years.

Harm means ill-treatment or impairment of health and development, including, for example, impairment suffered from seeing or hearing the ill-treatment of another;

Development means physical, intellectual, emotional, social or behavioural development;

Health includes physical and mental health; maltreatment includes sexual abuse and other forms of ill-treatment which are not physical.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to

facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Children may also cause harm to other family members, often referred to as child to parent or caregiver abuse.

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

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

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

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE): occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This can be committed by an organised network or gang, and the victim may identify as being part of this group. CCE and CSE 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. This may constitute modern slavery. Modern slavery - Statutory guidance. In accordance with this guidance, a relevant referral should be completed where a potential victim of CCE or CSE is identified.

All staff follow the schools Child Protection Procedures which are consistent with 'Working Together to Safeguard Children 2026' and the Calderdale Safeguarding Children Partnership guidance. The school is mindful of its obligations under the Human Rights Act 1998 and the Equality Act 2010.

It is **not** the responsibility of the school staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All members of staff however, have a duty to recognise concerns and maintain an open mind. Accordingly, all concerns regarding the welfare of pupils will be recorded and discussed with the Designated Safeguarding Lead with responsibility for child protection (or the Deputy DSL in the absence of the designated person) prior to any discussion with parents or those with parental responsibility.

Where a member of staff is recognising signs or indicators that a child may have unmet needs or welfare concerns these will always be passed on to the Designated Safeguarding Lead to ensure that any appropriate interventions and/or referrals can be actioned. The DSL will use the Calderdale Continuum of Need to determine the threshold of concern and then will determine whether this can be dealt with within school or whether this may require an Early Help Pathway Assessment, Single Assessment, Referral into the Early Intervention Panels or a referral into the Multi Agency Screening Team (MAST) if the child may be at the threshold of Child In Need or there is concern that the child is at risk of significant harm and thus Child Protection Enquiries (S47) may be needed. These signs or indicators may be of one of the main four types of abuse or neglect or may relate to other specific safeguarding issues.

3.2 Supporting the child partnership with parents and staff

School recognises that the child's welfare is paramount, however good child protection practice and outcomes rely on a positive, open and honest working partnership with parents and staff.

Whilst we may, on occasion, need to make referrals without consultation with parents, we will make every effort to maintain a positive working relationship with them whilst fulfilling our duties to protect any child.

We will provide a secure, caring, supportive and protective relationship for the child.

Children will be given a proper explanation (appropriate to age and understanding) of what action is being taken on their behalf and why.

We will endeavour to always preserve the privacy, dignity and right to confidentiality of the child and parents. The Designated Safeguarding Lead will determine which members of staff “need to know” personal information and what they “need to know” for the purpose of supporting and protecting the child.

However, it is made clear to staff in their safeguarding training that a referral can be made at any time by a member of staff and this does not require parental consent when referring to statutory agencies.

3.3 The Prevent Duty

Children may be susceptible to extremist ideology and radicalisation. Just like any other form of abuse, protecting them is a vital part of the school’s approach to safeguarding. The school assesses the risk of children being radicalised or drawn into extremism; this forms part of the staff safeguarding training, with specific sessions on Prevent duty.

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

1. negate or destroy the fundamental rights and freedoms of others; or
2. undermine, overturn, or replace the UK’s system of liberal parliamentary democracy and democratic rights; or
3. intentionally create a permissive environment for others to achieve the results in (1) or (2)

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

Under section 26 of the Counter-Terrorism and Security Act 2015, the School is aware that we must have due regard to the need to prevent people from being drawn into terrorism, and that this is known as the Prevent Duty.

In order to fulfil the Prevent Duty, staff have received training to help them to identify children who may be susceptible to radicalisation, and the school is committed to accessing further training to ensure that all staff are up to date and aware of this duty. If staff do identify children for whom this may be a concern, they will apply the usual referral process and Child Protection procedures and pass this information to the Designated Safeguarding Lead (DSL) with immediate effect.

The Designated Safeguarding Lead will contact the Prevent Coordinator (Calderdale) should there be concerns about a child or family linked to potential radicalisation or extremism. The Prevent Coordinator will then assist the DSL regarding whether a referral is appropriate and whether this child or family will need to be referred to Channel, a

voluntary confidential support programme focussing on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Referrals are assessed and may be passed onto a multi-agency Channel panel who meet to discuss the individual concerned and determine any appropriate support that may be required. When considering what support may be necessary in respect of a referred child, the Channel Panel will require the consent of the parent/carer of the referred child before any support can be delivered through this programme.

The Designated Safeguarding Lead (or a Deputy) should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives.

The Prevent Team can be contacted as follows: prevent@calderdale.gov.uk

Hipperholme Grammar School will also incorporate the promotion of fundamental British Values into the safeguarding curriculum and/or PSHE in order to help build pupils' resilience and enable them to challenge extremist views. School will provide a safe space in which children and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments through PSHE and be addressed as the necessity arises.

Radicalisation will also be considered within current Online Safety policies, procedures and curriculum in terms of having suitable filtering and monitoring in place and also raising awareness with staff, parents and children about the increased risk of online radicalisation, through the use of the internet, social media and gaming. (See additional information on roles, responsibilities, and requirements in respect of filtering and monitoring in Section 6.1 of this document)

3.4 Child Criminal Exploitation (CCE)

County Lines

The school recognises that specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators may threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons for a sense of protection and may often commit crimes themselves. Such vulnerability is not always recognised and victims may be criminally exploited even if the activity appears to be something they have agreed to or consented to.

This form of exploitation can be committed or facilitated by an organised network or gang, and victims may identify as part of this group.

Criminal exploitation of girls can be different from boys with girls often being at a higher risk of sexual exploitation.

Key indicators to identifying potential involvement in child criminal exploitation involve:

- 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.

When identifying missing episodes, the victim may have been trafficked for the purpose of transporting drugs. The school will therefore consider whether a referral to the National Referral Mechanism (NRM) should be undertaken in order to safeguard that child and/or other children.

[\(hyperlink to National Referral Mechanism - Guidance April 2026\)](#)

Child Sexual Exploitation

Hipperholme Grammar School is aware that; 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 or young person under the age of 18 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. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. (Child sexual exploitation: Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation (2017))

[CSE - A Guide for Practitioners](#)

[Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation](#)

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge. CSE can affect any child who has been coerced into engaging in sexual activities including 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited.

Victims are not always recognised and can be criminalised for actions they take whilst under coercion without fully understanding the abuse they are experiencing.

Staff have been made aware of some of the key indicators of CSE during staff annual safeguarding training. In addition, the school appreciates that it has a role to play in the

prevention of CSE within its safeguarding curriculum, through the development of healthy relationships.

If staff do identify children for whom CSE may be a concern they will follow normal safeguarding processes and child protection procedures. Staff must pass this information to the Designated Safeguarding Lead (DSL) immediately. The DSL will then assess the level of concern and consider referring cases where relevant to MAST and the Child Exploitation (CE) Hub.

Hipperholme Grammar School also appreciates that they have a role to play in sharing intelligence relevant to perpetrators of CSE, and therefore if such information should come to light within school, the DSL will share this appropriately with the police.

Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Tackling modern slavery is a complex process involving partner agencies. School have a part to play in identifying signs and indicators of this form of exploitation, ensuring appropriate referrals are made through the DSL to the Police, Calderdale MAST and the National Referral Mechanism (NRM). Further details can be found at:

[hyperlink to National Referral Mechanism - Guidance April 2026](#)

3.5 Female Genital Mutilation

Hipperholme Grammar School understands that Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia, and know that FGM is illegal in the UK, is a form of child abuse and has long-lasting harmful consequences. Hipperholme Grammar School is aware that Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers to report to the police where they discover that FGM appears to have been carried out on a girl under 18 years of age. This mandatory duty commenced in October 2015.

Staff are trained in the awareness of the indicators of FGM. If they were to directly observe (if involved in intimate care) or indirectly become aware of other potential indicators they must follow the normal safeguarding process and child protection procedures passing this information to the Designated Safeguarding Lead (DSL) immediately. The DSL will then assess this information and make appropriate referrals to MAST and the police as per their mandatory reporting duty. Staff will not undertake any examination of a pupil.

[Multi-Agency Guidance on FGM - DfE 2020](#)

3.6 Domestic Abuse (DA) and Relationship Conflict

Healthy relationships between parents and carers are critical to the holistic wellbeing of children. Where conflict is frequent and unresolved it can be harmful to both adults and children. Staff working with children may be the first to identify signs of anxiety in children that may be linked to parental conflict. School staff will work to support families and signpost for early help. Further information can be secured from: relationshipmatters.org.uk a programme supported by all West Yorkshire local authorities.

Hipperholme Grammar School understands that the cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

The abuse can encompass, but is not limited to: psychological, physical, sexual, financial, emotional harm.

Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

If staff do identify children for whom domestic abuse (DA) may be a concern, they must follow the normal safeguarding process and child protection procedures, passing this information to the Designated Safeguarding Lead (DSL) immediately. The DSL will then refer cases where relevant to Early Intervention Panels or MAST and share information where necessary with the Domestic Abuse Hub within the context of the daily risk assessment management meeting (DRAMM). Where DA Notifications are received from the Domestic Abuse Hub, this information will be added to a child's chronology and child protection record to ensure that appropriate support can be provided where necessary.

Operation Encompass

Operation Encompass is an initiative that directly connects the police with schools to ensure better outcomes for children who are subject or witness to police-attended incidents of domestic abuse.

One of the principles of Operation Encompass is that all incidents of domestic abuse are shared with schools, not just those where an offence can be identified.

It is a system that provides rapid support within the school environment meaning children are better safeguarded against the short, medium and long term effects of domestic abuse.

Operation Encompass provides an efficient, confidential channel of communication between the police, via the Domestic Abuse Hub to the Designated Safeguarding Leads. This enables the immediate and discrete recognition of the child's situation by key school staff, ensuring a secure and sympathetic environment is provided and the broader effects of abuse are addressed.

This information is shared by the police with schools regardless of whether parental permission to share the information has been provided at the time of police attendance at the domestic incident. All records are managed at child protection level and are recorded securely and directly onto the individual child safeguarding record in school in full accordance with General Data Protection Regulations (GDPR 2018) and the Data Protection Act 2018.

3.7 Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to 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). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

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

Staff at the school receive training to understand that forced marriage is a safeguarding concern and they will follow the normal safeguarding process and child protection procedures passing this information to the Designated Safeguarding Lead (DSL) immediately. The DSL will then assess this information and where necessary make appropriate referrals to MAST.

In dealing with such a concern the safeguarding team will work with other safeguarding agencies following national guidance:

[The Right to Choose - HM Govt. guidance on Forced Marriage](#)

3.8 Child on Child Abuse

Children can and sometimes do abuse other children (sometimes referred to as child on child abuse). Such abuse can happen both inside and outside of school and online (known as cyber bullying). All abuse of this kind is unacceptable and will be taken seriously. Children may not feel ready or know how to tell of abuse, or may not recognise their experiences as harmful. Such abuse will need to be referred to an external safeguarding agency.

The School adopts a zero tolerance approach to child on child abuse.

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 peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery);
- 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).

School staff have received training in recognising the indicators and signs of child on child abuse and know how to identify it and respond to reports.

Staff understand that even if there are no reports of such abuse in school it does not mean it is not happening, it may be the case that it is just not being reported. Staff are aware

that it is important that if staff have any concerns regarding child on child abuse, they speak to the designated safeguarding lead.

All staff are trained to understand the importance of challenging inappropriate behaviours between peers that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. We do recognise the gendered nature of child on child abuse and that this must be addressed as unacceptable behaviour. However, there are systems in place for pupils to know who to talk to and confidently report abuse. Their concerns will always be treated seriously.

Staff are clear that whilst these may be responded to through behaviour management processes, there is also a need for this information to be shared with the DSL in order to address any underlying safeguarding concerns.

School staff are particularly vigilant of students with identified special educational needs and/or disabilities who may be particularly vulnerable to child on child abuse.

Such behaviour should never be considered as ‘banter’ or part of growing up. Child on child abuse often meets the threshold for the recording and investigation of criminal offences by the Police.

Staff becoming aware of any incident of child on child abuse must follow the safeguarding process and child protection procedures, passing this information to the Designated Safeguarding Lead (DSL) immediately. The DSL will then assess this information and where necessary make appropriate referrals to MAST and potentially the police, should criminal offences be identified.

Child on child allegations that do not meet the threshold for police investigation will be subject of internal school investigation by the Designated Safeguarding Lead and/or senior leaders at the school. This will involve speaking to the victim and any witnesses to secure accounts of the allegation. All findings including any additional information secured, will be considered when making decisions around resolution of the allegation. Outcomes may involve application of the school behaviour policy.

School recognises that victims of child on child abuse need to be supported and with parental consent, may secure external agency support where this is deemed appropriate.

All staff will reassure victims 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 child on child abuse, nor should a victim ever be made to feel ashamed for making a report.

School recognises that perpetrators of child on child abuse may have identified unmet needs of their own and with parental consultation, may secure external agency support where this is deemed appropriate. Early intervention will minimise the risks going forward.

3.9 Youth Produced Sexual Imagery

Where there is a disclosure from a child or young person and/or the school becomes aware that a child may have been involved in sending 'youth produced sexual imagery' which is sometimes referred to as 'sexting' or sending 'nudes or semi nudes', it will refer to the guidance in the UKCIS document 'Sharing nudes and semi-nudes: advice for education settings working with children and young people (March 2024).

[Sharing Nudes and Semi-Nudes - Guidance to education settings - updated March 2024](#)

Staff understand that when an incident involving youth produced sexual imagery comes to their attention:

- The incident must be referred to the DSL immediately.
 - The DSL should hold an initial review meeting with appropriate school staff.
 - There should be subsequent interviews with the young people involved (as appropriate).
 - Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm
- The DSL will assess the information available and with the use of appropriate risk assessment tools, decide the appropriate response by the school to such an incident

[Calderdale Sexual Harmful Behaviour Toolkit.](#)

- At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.

3.10 Attendance and Children Absent from Education

Children being absent from education for prolonged periods, and/or on repeat occasions can act as a vital safeguarding warning sign. Staff receive training to understand the impact of persistent absence of children and the effect that absence places on their safeguarding and well-being.

The school maintains a whole school culture that promotes the benefits of high attendance and has robust procedures in place to monitor absence ([Attendance and Registration Policy](#)). Likewise the school understands that a parent failing to inform the school that a child has an authorised absence could be a cause for concern and thus will follow the school's 'First Day Calling' procedure in these circumstances in order to try and locate the child and ensure that they are safe.

The school has a duty to investigate such unauthorised absences to establish if safeguarding concerns are evident.

Once identified as a concern, the school will work with the Local Authority Education Welfare Service and other partner agencies as necessary to support children and their families to achieve high school attendance following the below DfE guidance:

[Working together to improve school attendance - July 2026](#)

The school appreciates that the Local Authority has a statutory duty to ensure that all children and young people of compulsory school age receive suitable and appropriate education. The school will therefore support the Authority in ensuring that this duty is carried out effectively.

There are specific duties in respect of Children Missing Education (CME) and there are strict guidelines in respect of both the definition of CME and the legalities of deleting a pupil from a school roll.

The Local Authority will be informed when a pupil has been added or removed from the admissions register at non-standard transition times, within five days of them joining.

Where a pupil leaves the School, the Local Authority will be notified as soon as grounds for the deletion are met but no later than when the name is deleted from the register. The grounds for deletion are where a pupil:

- has been taken out of school by their parents and is being educated outside the school system e.g. is in home education
- has ceased to attend school and no longer lives within reasonable distance of the school at which they are registered
- has been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age
- is in custody for a period of more than four months due to a final court order and the School does not reasonably believe they will be returning at the end of that period
- has been permanently excluded.

The School understands that it is essential that contact is made with the Education Welfare Service as soon as a child or young person is believed to have left the school without suitable education provision being provided. In addition, the School will contact the Local Authority to inform them where any pupil has been absent for 10 consecutive days without a reason being provided for the absence. (Duncan Thorpe 01422 266125)

[Children Missing Education - Guidance for Local authorities - August 2024](#)

3.11 Serious Violence

Staff are aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault

or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Factors which heighten risk and increase the likelihood of involvement in serious violence, include being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

The School response to such concerns will involve a partnership approach, which may involve local authority services via a MAST referral, the Police and other partnership services.

[Serious Violence - Home Office Dec. 2022](#)

3.12 Contextual Safeguarding

Contextual safeguarding is an approach to understanding and responding to young people's experiences of significant harm beyond their families. It recognises that the environments in which young people spend time, such as peer groups, neighbourhoods, and online spaces, can expose them to risk.

Our school is committed to safeguarding all pupils, not only within the home but also in the wider contexts in which they live and interact. We recognise that extra-familial harm can occur in various settings and that effective safeguarding requires a holistic understanding of these environments.

Should staff identify any such concerns, they will refer them to the Designated Safeguarding Lead, immediately.

The school will work collaboratively with our safeguarding partners in children's social care, police, and other community agencies to address and reduce such risks.

3.13 Children with Family Members in Prison

The School understands that children who have members of their family in prison are more likely to underachieve and fail to reach their potential than their peers and may require specific services and support. They are more likely to be absent (or excluded) than their peers, to experience mental ill-health and drug and alcohol misuse. Families and children of people in prison will be seen as families first and school will work to ensure their needs are appropriately met. This will include providing support to ensure the voice of the child is considered when seeking contact with a family member in prison.

3.14 Child on Child Sexual Harassment and Sexual Violence

Sexual harassment and sexual violence involving children at the school is a form of child on child abuse. It can occur between children of any age and sex. It can happen inside or outside of school and online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual harassment and sexual violence will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment.

Sexual harassment and sexual violence exist on a continuum and may overlap, they can occur online and offline (both physical and verbal).

Children with special educational needs and disabilities (SEND) are 3 times more likely to be abused than their peers.

Additional barriers can sometimes exist when recognising abuse in SEND children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- the potential for children with SEND being disproportionately impacted by behaviours such as peer group isolation, bullying (including prejudiced-based bullying) and harassment, without outwardly showing any signs;
- Issues of cognitive understanding - being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or the consequences of doing so; and
- communication barriers and difficulties overcoming these barriers.

Any reports of abuse involving children with SEND will therefore require close liaison with the DSL and the SENCO.

School staff are made aware through safeguarding training of the specific stance to school take on this subject including:

- making clear that sexual harassment and sexual violence is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual harassment or sexual violence as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts, and genitalia, flicking bras, and lifting up skirts.

Staff awareness training also includes:

- not recognising, acknowledging, or understanding the scale of harassment and abuse and/or downplaying some behaviours related to abuse can lead to a culture of unacceptable behaviour, misogyny, an unsafe environment and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.
- recognising the escalatory nature of misogyny and the benefits of early identification to support their approach to minimising the risk of Harmful Sexual Behaviour (HSB), sexual harassment and sexual violence.

- understanding that all of the above can be driven by wider societal factors beyond the school and college, such as everyday sexist stereotypes and everyday sexist language.

A whole school approach is taken to such safeguarding concerns and includes preventative education through the school PSHE/RSE curriculum.

All staff will reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting abuse, sexual harassment, or sexual violence. Nor should a victim ever be made to feel ashamed for making a report.

The following definitions are to be applied on a child-on-child context:

Sexual harassment is defined as unwanted conduct of a sexual nature which can occur both online and offline and inside and outside of school or college.

Sexual violence can and does occur, both inside and outside of school or college. It involves the criminal sexual offences defined in the Sexual Offences Act 2003 which include: Rape, Assault by Penetration, Sexual Assault and Causing someone to engage in sexual activity without consent.

In relation to the issue of consent the following legal definitions apply:

- a child under the age of 13 can never consent to any sexual activity
- the age of true consent is 16
- sexual intercourse without consent is rape.

The School takes all such reports seriously and they will receive the same high standard of care that any other safeguarding concern receives.

A multi-agency approach will be undertaken when responding to all such complaints; however, the School will always take immediate action to protect children despite the actions of any other agency. These actions may include an immediate risk assessment in respect of the needs of the child victim and will address any risks identified to any child in respect of an alleged perpetrator of sexual harassment or sexual violence to ensure children are protected from harm.

Any risk assessment will be fluid and may change to reflect any developments during the management of the case.

All such reports will be managed by the Designated Safeguarding Lead.

There are a number of options the school may consider in respect of the management of a report of sexual harassment or sexual violence between children and each case will receive an appropriate bespoke response as facts are established.

Irrespective of any potential criminal outcome, the School has a duty to safeguard all children and may deal with any such report on a balance of probability basis when considering the outcomes for the children involved. Should an outcome involve a move to an alternative school for any child, then full information sharing of the case will be undertaken with the Designated Safeguarding Lead professional at that school.

The school will maintain protective and supportive measures for victims which may need to cover an extended period of time.

3.15 Homelessness

The School is aware that being homeless or being at risk of becoming homeless presents a real risk to the welfare of a child. Indicators that a family may be at risk of becoming homeless include household debt, rent arrears, domestic abuse and anti-social behaviour. The School recognises that referrals to Calderdale Housing Options Service may be necessary. Concerns around homelessness may also require an accompanying referral to Children's Social Care where welfare concerns are identified or a child has been harmed or is at risk of harm. In some cases children over the age of 16 could be living independently of their parents or carers for example through exclusion from the family home. Where this situation is identified Children's Social Care will be the lead agency and the Designated Safeguarding Lead at school will ensure that an appropriate referral has been made to the Calderdale Multi-Agency Screening Team in the first instance.

The [Homeless Reduction Act 2017](#) places a legal duty on councils to provide advice and support.

3.16 Private Fostering

A 'privately fostered' child is a child under the age of 16 (18 if disabled) who is cared for and accommodated by someone other than a parent or close relative for more than 28 consecutive days.

Any child separated from their parent is potentially vulnerable and thus there is a responsibility to ensure that the alternative care meets their welfare and safety needs.

The parents or those with parental responsibility and the private foster carer have a duty to notify the local authority of this arrangement.

In accordance with Part 9 of The Children Act 1989, where a private fostering arrangement is identified in respect of any child, the school will inform the relevant local authority of such an arrangement in order to ensure the child will be satisfactorily safeguarded and their welfare promoted.

3.17 Child Mental Health

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

Only trained professionals should attempt to make a diagnosis, however our school staff are well placed to observe children on a day-to-day basis and identify behaviour that might suggest a child is experiencing a mental health problem or be at risk of developing one, including:

- Physical signs of harm
- Changes in eating and sleeping habits
- Increased isolation from friends and family and becoming socially withdrawn
- Changes in mood
- Talking and/or joking about self-harm and/or suicide
- Feelings of failure, uselessness, and loss of hope
- Secretive behaviour
- Clothing unsuitable for the time of year, e.g. a large winter coat in summer
- Negative behaviour patterns, e.g. disruption
- Attendance and absenteeism
- Punctuality and lateness
- Changes in educational attainment and attitude towards education
- Family and relationship problems
- Mental health needs that arise from bereavement, health issue or anything that has had a substantial change or impact on the pupil's life

Whilst all children should be protected, it is important that staff recognise that some groups of children are potentially at greater risk of harm (including online harm). For example, this vulnerable group includes, but is not limited to: those children with SEND (see below), young carers, those with a parent in prison, those identifying as LGBTQ+, and those living in homes characterised by domestic abuse and/or parental acrimony.

Where children have suffered potentially harmful adverse childhood experiences, this can have a lasting effect throughout childhood and into their adult life. These warning signs will always be taken seriously and staff who notice any of these signs will communicate their concerns with the DSL (also the school's designated Senior Mental Health Lead) as appropriate, so the most appropriate follow up action can be taken. This may include referral to the School's counsellor, an independent person with whom sessions can be arranged, in or out of school. The initial consultation is fully funded by the School and subsequent sessions are payable by the parents/carers and the school 50/50.

Calderdale has a number of support services with access to trained professionals that are available to support schools. The support available is coordinated through the Open Minds programme and can be accessed through the following link: www.openmindscalderdale.org.uk

The Department of Education has published advice and guidance on [Preventing and Tackling Bullying](#), and [Mental Health and Behaviour in Schools](#). 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.

3.18 SEND & LGBT+

Staff are made aware that SEND and LGBT+ pupils are particularly vulnerable to child on child abuse and to monitor this carefully.

3.19 Online Safety

There is a whole school approach to Online Safety and a clear policy on the use of mobile technology (see Acceptable use of Mobile Devices Policy; Bring your own Device to Work Policy) Digital safety is a priority of the school. This is monitored and controlled in several ways:

1. Google Workspace for Education Plus
2. Smoothwall Filter
3. Smoothwall Monitor
4. CPOMS/Daybook
5. Parent & Pupil briefings (Smoothwall Online Safety Hub)

Our Governing Body regularly reviews the effectiveness of filters and the school monitoring system.

3.19.1 Google Workspace for Education Plus

This edition includes all the enhanced security features and tools from Education Standard and the Teaching and Learning Upgrade. It offers secure sign-in and password control through its admin console with email end-to-end encrypted with realtime spam filtering and user warnings and controls. Alerts allow administrators to quickly and easily prevent, detect, and remediate security incidents and track security health as well as extract Gmail logs and Classroom logs for analysis or viewing audit logs of changes and activity.

3.19.2 Smoothwall Filter

This is a real-time web filter which provides a safe, monitored environment for age-appropriate online learning. As well as basic blocklists all content is textually analysed

as it streams to the user so over blocking is eliminated so that students enjoy the safest online learning.

All devices are installed with always-on monitoring which extends to home use for any activities performed within the Chrome browser when signed-in to a school user account.

3.19.3 Smoothwall Monitor

This captures user activity that may indicate a risk as it happens, even outside of the regular web browser such as in a Word Document, messaging app, or encrypted “dark web” browser. DSLs receive alerts regarding any potential risks and can access these on the Monitor portal. This extends to home-use for any activities that are signed in to the Chrome browser. High alert risks are assessed 24/7 by an in-house team of moderators who review captures to minimise false positives and contact DSLs by phone for any urgent risks.

3.19.4 CPOMS/Daybook

DSLs record any alerts deemed as a safeguarding incident on pupils’ CPOMS electronic file or on their Daybook file depending on the nature of the incident. Information can be added to the alert within a student’s safeguarding record.

3.19.5 Parent & Pupil briefings (& National Online Safety)

The DSLs are alerted to any inappropriate online activity through the use of a filtering system monitored by Smoothwall. We recognise that many children now have unlimited and unrestricted access to the internet via mobile phone networks which some may abuse to sexually harass their peers or share images, or view harmful content such as pornography. Online safety is regularly addressed in assemblies, tutor time, PSHE and IT lessons. Parents are also regularly informed of current issues and trends and how to support their child outside of school via newsletters and the school website, and engaging with Smoothwall Online Safety Hub with resources and information on the school website. The use of mobile phones in school is carefully monitored and the children are not allowed to have them switched on in lessons during the school day. If the child is seen using a mobile phone it is confiscated and a lunchtime detention issued. The exceptions are that seniors, under the supervision of a class teacher, may be allowed to use them in lessons as a learning resource.

Section 4 Allegations made against/Concerns raised in relation to teachers, including supply teachers, trainee teachers, other staff, volunteers, and contractors.

Where an allegation is made against any person working in or on behalf of the School, the procedures detailed in Keeping Children Safe in Education 2026 (Part 4) and the Calderdale Managing Allegations procedures will be followed.

4.1 Managing allegations that may meet the harm threshold

All allegations are reported to the Local Authority Designated Officer (LADO) immediately and within one working day at the latest. Whilst we acknowledge such allegations may be false, malicious, or misplaced, we also acknowledge that they may be founded and shall therefore be treated with respectful uncertainty, investigated properly and in line with agreed procedures of the-LADO for Calderdale.

Allegations made against a member of staff will be dealt with by the Head of Foundation. No investigations of allegations against staff will be made without first consulting the LADO. This includes allegations against DSLs, supply staff, contractors and volunteers. In the Head's absence allegations should be reported to the Chair of Governors. For supply staff and contractors the agency / business would be kept fully informed.

Where an allegation is made against the Head of Foundation the matter will be dealt with by the Chair of the Governing Body, or nominated Governor, without informing the Head; in case of serious harm the police would be informed at the outset.

The needs of the child or children will remain at the centre of all action taken. With this in mind, any referral to the Local Authority Designated Officer should also be accompanied by consultation with Calderdale MAST. This is to establish from the outset whether the concerns identified meet the threshold for a Section 47 child protection investigation and/or the police in respect of any criminal investigation.

In the most serious of cases and if a crime has been committed, the police must be informed.

4.2 Managing concerns that do not meet the harm threshold

Where lower-level concerns and allegations that do not meet the harms test are reported or identified, the school will ensure that they are shared responsibly and with the right person and that they are appropriately dealt with and recorded.

See Appendix 5 for the School's Low Level Concerns Policy

Low level concerns could include being over friendly with children; having favourites; taking photographs of children on their mobile phone, contrary to school policy; engaging with a child on a one to one basis in a secluded area or behind a closed door; and humiliating children

School will encourage an open and transparent culture; to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the school.

Concerns identified at the lower level indicate that an adult may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Where considered relevant the school will ensure parents/carers are informed.

Please see the Low Level Concerns Policy Appendix 5 for further information.

4.3 External groups or individuals using school premises

In relation to allegations: Schools and colleges may receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations or service providers that run extra-curricular activities). As with any safeguarding allegation, the school will follow its safeguarding policy and procedures, including informing the LADO.

Child Protection Procedures

The aims of these procedures are:

- To clarify roles and responsibilities of everyone within our school in relation to safeguarding.
- To have clear procedures that are followed when a child is identified as needing more than universal services can provide.

The term “child” or “children” refers to anyone under the age of 18 years.

Section 5 Pupil Information

5.1 Pupil Information

In order to keep children safe and provide appropriate care for them, the School requires accurate and up to date information regarding:

- names, contact details and relationship to the child of any persons with whom the child normally lives.
- names and contact details of all persons with parental responsibility (if different from above), and emergency contact details for two persons with parental responsibility.
- emergency contact details (if different from above), ensuring that if the person(s) with parental responsibility is unable to collect this person, who could collect the child and keep them safe until either the person(s) with parental responsibility is available or a more suitable arrangement is made. The School encourages all parents and carers to provide more than one emergency contact, providing the school with additional options to make contact with a responsible adult when a child missing education is identified as a welfare and/or safeguarding concern.
- details of any persons authorised to collect the child from school (if different from above).

- any relevant court orders in place including those which affect any person's access to the child (e.g. Residence Order, Contact Order, Care Order, Injunctions etc.)
- if the child is or has been subject to a Child Protection Plan.
- if the child is or has been subject to the Early Help Pathway or Child In Need (CIN) processes.
- If the child is a Child Looked After (CLA).
- name and contact details of GP
- any other factors which may impact on the safety and welfare of the child.

The School will collate, store and agree access to this information, ensuring all information held electronically is stored securely with due regard to meeting the requirements of the Data Protection Act 2018 and safeguarding requirements.

5.2 Transfer of files

It is the responsibility of our school to maintain the original child protection file whilst the child is a pupil here.

When a child leaves the school their original child protection file is transferred to their new school as soon as possible and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This original file will be transferred separately from the main pupil file. This is usually undertaken between Designated Safeguarding Leads at both schools and may be undertaken electronically. If the child moves out of the area the child protection file is transferred by recorded delivery and signed for and is clearly marked confidential. A receipt is obtained which states when the file was transferred and who delivered and received the file.

When a vulnerable young person is moving to a further education (FE) establishment, consideration will be given to the student's wishes and feelings about their child protection information being passed on, so that the FE establishment can provide appropriate support. Consent will always be sought from the student. If the student cannot consent, information can be shared with professionals only if it is necessary and in their best interests.

A transferring school does not need to keep copies of child protection files, however, may have good reason to do so, such as a copy of the child's chronology and any documents that the school created e.g. risk assessments and documents in relation to involvement with ongoing proceedings, in an archive file. Any such files must be kept in accordance with the school data retention policy and rules.

The receipt of the transferred file is kept alongside this archive. Any archived files are stored securely in the same way as an active file.

Section 6 Roles and Responsibilities

6.1 The Governing Body

Our Governing Body will ensure that:

- all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenges to test and assure themselves that the school's safeguarding policies and procedures are effective and support the delivery of a robust whole school approach to safeguarding. The training will be regularly updated;
- there is a named Safeguarding Governor that takes the lead on safeguarding arrangements ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development with a focus on the best interests of the child;
- the School has an effective Safeguarding policy and Child Protection procedures in place that are in accordance with local authority guidance and locally agreed inter-agency procedures, and the policy is available publicly via the school website or other means. The policy will be reviewed and updated on an annual basis;
- the School has a behaviour policy, which includes measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- the School has a staff behaviour policy or code of conduct and that this is provided to all staff and volunteers on induction. The policy includes acceptable use of technology, staff/pupil relationships and communications including the use of social media;
- the School has appropriate safeguarding arrangements in place to respond to children who go missing from education, particularly on repeat occasions;
- the School operates safer recruitment procedures and makes sure that all appropriate checks are carried out on staff and volunteers who work with children; and that any panel involved in the recruitment of staff has at least one member who has undertaken safer recruitment training;
- the School has procedures for dealing with allegations against staff and volunteers that comply with guidance from the local authority and locally agreed inter-agency procedures;
- online safety policy and procedures are in place and training and support is provided for staff and pupils to ensure that there is a good understanding of child protection issues related to electronic media;

- a senior member of the school's leadership team is appointed to the role of DSL who will take lead responsibility for safeguarding and child protection;
- the school has one or more deputy DSL's who are trained to the same standard as the lead DSL;
- that children are taught about safeguarding, including online safety as part of providing a broad and balanced curriculum;
- they remedy without delay, any deficiencies, or weaknesses regarding child protection arrangements;
- a governor is nominated to be responsible for liaising with the LA and /or partner agencies in the event of allegations being made against the Head of Foundation;
- where services or activities are provided on the school premises by another body, the body concerned has appropriate policies and procedures in place with regard to safeguarding children and liaises with the school on these matters where appropriate;
- they review their safeguarding related policies and procedures annually;
- will ensure the appointment of an appropriately trained designated teacher with responsibility for "promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales" in addition to Children who are Looked After (CLA).

Filtering and Monitoring systems, and Generative Artificial Intelligence

- the school has implemented appropriate electronic filtering and monitoring systems to safeguard children from potentially harmful and inappropriate online material, while ensuring that "over blocking" does not unreasonably restrict educational content. If the school chooses to incorporate Generative AI products into its processes, it will maintain robust filtering mechanisms to reliably prevent access to harmful content, with updates made in response to any emerging threats; additionally, the school will enforce comprehensive activity logging procedures around AI usage, including recording input prompts and responses, analysing performance metrics, and alerting the Designated Safeguarding Lead when harmful or inappropriate content is accessed or attempted;
- the school will obtain parental consent for using any pupil data in AI tools;
- staff including the head teacher, undertake appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. This will be updated annually;

- an annual review of the filtering and monitoring provision at the school is undertaken to ensure that the school is meeting standards provided by the DfE;
- a member of the senior leadership team and a governor, is responsible for ensuring the above standards are being met.

Further guidance on the use of Generative AI in schools can be found at: [Generative artificial intelligence \(AI\) in education- August 2025](#)

In creating compliance with all DfE requirements on the use of IT, the school will adhere to the: [Meeting digital and technology standards in schools and colleges - updated June 2026](#)

6.2 The Head of Foundation

Our Head of Foundation will ensure that:

- the policies and procedures adopted by the Governing Body or Proprietor are fully implemented, and followed by all staff;
- sufficient resources and time are allocated to enable the designated safeguarding lead and other staff to discharge their responsibilities including taking part in strategy discussions and other inter-agency meetings and contributing to the assessments of children;
- EYFS Safeguarding and Well-Being requirements are met in line with section 3 of the Early Years Statutory Framework;
- there are arrangements in place for safeguarding supervision for the Designated Safeguarding Lead and the deputy Designated Safeguarding Lead(s);
- all staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children, and such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle blowing policies;
- the Designated Safeguarding Lead is supported in providing a contact for the school to provide a report and attend Initial Child Protection Case Conferences, Reviews and Children Looked After Reviews out of school term time when needed;
- allegations regarding staff or any other adults in the school are referred to the Local Authority Designated Officer (LADO), as set out in the Managing Allegations procedure;
- individuals are referred to the Disclosure and Barring Service in cases where a person is dismissed or removed due to risk/harm to a child. This is a legal duty placed upon the school;
- where a teacher is dismissed or school ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, our Head of Foundation must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency);
- any looked after children that attend the school are appropriately catered for in relation to welfare and progress; there are currently no looked after children on the school roll.

Details about how to make a referral to the Teaching Regulation Agency can be found on <https://www.gov.uk/guidance/teacher-misconduct-referring-a-case>

6.3 The Designated Safeguarding Lead

Our Designated Safeguarding Lead (DSL) as stated in Keeping Children Safe in Education (2026) will ensure that they:

Manage referrals

The Designated Safeguarding Lead is expected to refer cases:

- of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care;
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- where a crime may have been committed to the Police as required.
- where there is judged to be a risk of immediate serious harm to a child an immediate referral to MAST will be made.

Work with others

- act as a source of support, advice and expertise for all staff;
- act as a point of contact with the safeguarding partners;
- liaise with the headteacher and where appropriate the appointed Safeguarding Governor, to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member;
- liaise with staff (especially teachers, pastoral support staff and special educational needs coordinators (SENCOs),) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically;
- liaise with a Mental Health Support Team, where safeguarding concerns are linked to mental health;
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- work with the Head of Foundation and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or

have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college. This includes:

- ensure that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and, support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.
- Getting in touch verbally with the new school when a child leaves with safeguarding issues so that the new school can put in support before the child arrives.

Training, knowledge and skills

The DSLs (and any Deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years. They will also undertake Prevent awareness training.

In addition to the formal training, their knowledge and skills will be refreshed at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role (*this will be done by attending the termly Calderdale DSL Network Meetings and by attending appropriate Calderdale Safeguarding Children Board multi-agency training and other relevant training and/or conference opportunities*) so they:

- take lead responsibility for safeguarding and online safety, which includes overseeing and acting on: filtering and monitoring reports, safeguarding concerns and checks to filtering and monitoring systems;
- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- understand the importance of the role the designated safeguarding lead has in providing information and support to children social care in order to safeguard and promote the welfare of children;
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;

- understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and,
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

Providing support to staff

The School will support the Designated Safeguarding Lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- share information and raise awareness;
- ensure that staff are supported during the referrals processes; and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of children

It is important that children feel heard and understood. Therefore the Designated Safeguarding Leads will be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them; and,
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Availability

- during term time the Designated Safeguarding Lead (or a Deputy) will always be available for staff in the School to discuss any safeguarding concerns. (The term 'available' includes by means of communication using a mobile device);
- there will also be a DSL or Deputy available to be contacted out of hours/out of term for urgent enquiries such as an Initial Child Protection Case Conference.

6.4 Staff and Volunteers

All staff and volunteers will:

- read and sign to say that they understand and will fully comply with the school's policies and procedures;
- read and sign to say that they understand Part 1 of 'Keeping Children Safe in Education' 2026 (or Annex A as directed by the school senior leadership team) and know how to apply the guidance;
- will receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring systems and procedures in place at school;
- attend annual whole school safeguarding training and other appropriate training identified;
- identify concerns as early as possible and provide help, to prevent concerns from escalating and identify children who may be in need of extra help or who are suffering or are likely to suffer significant harm;
- provide a safe environment in which children can learn;
- be aware that they may be asked to support a Social Worker to take decisions about individual children;
- inform the designated safeguarding lead of any concerns about a child immediately;
- inform the head of any concerns regarding an adult within school at the earliest opportunity;
- inform the Chair of Governors of any concerns regarding the head at the earliest opportunity.

Section 7 Responding to concerns and follow up actions

7.1 Concerns that staff must immediately report

It is **not** the responsibility of the school staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All members of staff, however, have a duty to recognise concerns and maintain an open mind. Accordingly, all concerns regarding the welfare of pupils will be recorded and discussed with the designated safeguarding lead (or the Deputy DSL in the absence of the DSL) prior to any discussion with parents.

Concerns that staff must immediately report:

- any suspicion that a child is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play;
- any explanation given which appears inconsistent or suspicious;
- any behaviours which give rise to suspicions that a child may have suffered harm (e.g. worrying drawings or play);
- any concerns that a child may be suffering from inadequate care, ill treatment, or emotional maltreatment;
- any concerns that a child is presenting signs or symptoms of abuse or neglect;
- any significant changes in a child's presentation, including non-attendance;
- any hint or disclosure of abuse from any person;
- any concerns regarding person(s) who may pose a risk to children (e.g. living in a household with children present);
- any potential indicators of Child Exploitation (CE);
- any potential indicators of FGM;
- any potential indicators of radicalisation;
- any potential indicators of living in a household with domestic abuse.

7.2 Responding to Disclosure

Disclosures or information may be received from pupils, parents or other members of the public. The School recognises that those who disclose such information may do so with difficulty, having chosen carefully to whom they will speak. Accordingly all staff will handle disclosures with sensitivity and pupils with communication difficulties will be given the opportunity to express themselves to a member of staff who they are comfortable with in school. Such information cannot remain confidential and staff will immediately communicate what they have been told to the designated safeguarding lead and make a contemporaneous record.

Principles:

Staff will not investigate but will, wherever possible, elicit enough information to pass on to the designated safeguarding lead in order that s/he can make an informed decision of what to do next.

The Designated Safeguarding Lead will ensure that the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Child protection processes will operate with the best interests of the child at their core.

Staff will:

- listen to and take seriously any disclosure or information that a child may be at risk of harm;
- try to ensure that the person disclosing does not have to speak to another member of school staff;
- clarify the information;
- try to keep questions to a minimum and of an 'open' nature e.g. using TED technique: 'Tell me, Explain to me, Describe to me....';
- try not to show signs of shock, horror or surprise;
- not express feelings or judgements regarding any person alleged to have harmed the child;
- explain sensitively to the person that they have a responsibility to refer the information to the designated safeguarding lead, children need to know that staff may not be able to uphold confidentiality where there are concerns about their safety or someone else's;
- reassure and support the child as far as possible;
- explain that only those who 'need to know' will be told;
- explain what will happen next and who will be involved as appropriate;
- record details including what the child has said, in the child's words on a 'Record of Concern'/'Cause for Concern' form in the Juniors (example available in Appendix 1) or on SchoolBase in the Seniors and record any visible signs, injuries or bruises on a Body Map (example available in Appendix 2).
- record the context and content of their involvement, and will distinguish between fact, opinion and hearsay.

7.3 Action by the Designated Safeguarding Lead (or Deputy DSL in their absence)

Following any information raising a concern, the Designated Safeguarding Lead will consider:

- any urgent medical needs of the child;
- whether the child is subject to a child protection plan;
- discussing the matter with other agencies involved with the family;
- consulting with appropriate professionals known to the child e.g. Early Help Service Manager, Multi-Agency Screening Team (MAST), medical professional working with the child and/or Safeguarding Advisor for Education;
- the child's wishes.

Then decide:

- to talk to parents, unless to do so may place a child at risk of significant harm, impede any police investigation and/or place the member of staff or others at risk;

- whether to make a child protection referral to the Multi-Agency Screening Team (MAST) because a child is suffering or is likely to suffer significant harm and if this needs to be undertaken immediately;

OR

- not to make a referral at this stage;
- if further monitoring is necessary;
- if it would be appropriate to undertake an assessment (e.g. Early Help assessment) and/or make a referral to the Early Intervention Panel and/or to other services.

All information and actions taken, including the reasons for any decisions made, will be fully documented and the process depicted in the flowchart in Appendix 3 will be followed. All referrals to Multi-Agency Screening Team (MAST) will be followed up in writing using the Calderdale Request for Service/Referral Form and these referrals will always be kept on file irrespective of the outcome. In the event of an external referral, the Safeguarding Governor and Chairman will be informed.

If the DSL is of the view that concerns are not being responded to appropriately then these concerns will be escalated appropriately until the DSL feels that some resolution has been achieved. Initial escalation would be to the appropriate Team Manager, however may also involve escalation to the appropriate Service Manager if it is felt necessary to do so.

7.4 Action following a child protection referral

The Designated Safeguarding Lead or other appropriate member of staff will:

- make regular contact with the social worker involved to stay informed;
- wherever possible, contribute to the strategy discussion;
- provide a report for, attend and contribute to any subsequent child protection conference;
- if the child or children are made the subject of a child protection plan, contribute to the child protection plan and attend core group meetings and review conferences;
- where possible, share all reports with parents prior to meetings;
- where in disagreement with a decision made by Multi-Agency Screening Team (MAST) e.g. not to apply child protection procedures or not to convene a child protection conference, follow the guidance in the West Yorkshire Consortium Safeguarding Children Procedures - 2.8 Resolving Multi Agency Professional Disagreements and Escalation;

https://westyorkscb.proceduresonline.com/p_res_profdisag.html

- where a child subject to a child protection plan moves from the school or goes missing, school will immediately inform the Multi-Agency Screening Team (MAST).

7.5 Recording and monitoring

Accurate records of concerns, discussions and decisions will be made as soon as practicable and will clearly distinguish between observation, fact, opinion and hypothesis. All records will state who is providing the information, the date and time, information will be recorded in the child's words where possible and a note made of the location and description of any injuries seen, if this is a paper record then this should be signed.

An example of how this is done can be found in Appendix 1.

The DSL ensures that the method for other members of staff or volunteers passing on concerns or information is always adhered to as consistency is paramount in ensuring that nothing gets missed.

Safeguarding records will include:

- a clear and comprehensive summary of the allegation;
- details of how the allegation was followed up and resolved;
- a note of any action taken, decisions reached, rationale for those decisions, and the outcome.

All documents are retained in a 'Child Protection File', separate from the child's school file. This is locked away and only accessible to the Head of Foundation and the DSLs. The electronic file Daybook is stored securely with appropriate levels of access. The creation, retention and maintenance of all child protection files will meet the requirements of the Data Protection Act 2018 (which includes the General Data Protection Regulations 2018) These records will be transferred to any school or setting the child moves to, clearly marked 'Child Protection, Confidential, for attention of Designated Safeguarding Lead for Child Protection,' and a receipt of this transfer will be retained.

It is the responsibility of the final school the child attends to maintain the original child protection file until the child reaches the age of: date of birth plus 25 years. If the file relates to sexual abuse, retain until the child's 75th birthday.

If the child goes missing from education or is removed from roll to be educated at home, any child protection file will be transferred and sent to the Education Welfare Service.

Section 8 Low Level Concerns Policy

1. Policy Statement

1.1 Hipperholme Grammar School ("the School") understands the importance of a positive culture where concerns can be identified and spoken about openly and acknowledges that this is a key element of a strong safeguarding system. This Low Level Concerns Policy seeks to ensure that all staff who work with children behave appropriately and to enable the early identification and prompt, appropriate management of concerns.

1.2 As part of its whole school approach to safeguarding, the School will ensure that it promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the School (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

1.3 Creating a culture in which all concerns about adults (including allegations that do not meet the harm threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enable the School to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the School are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the School.

1.4 This Low Level Concerns Policy operates in conjunction (as appropriate) with the following:

- 1.4.1 School's Code of Conduct
- 1.4.2 Child Protection and Safeguarding Policy
- 1.4.3 Disciplinary Procedure
- 1.4.4 Capability Procedure
- 1.4.5 Grievance Procedure
- 1.4.6 Whistleblowing Policy
- 1.4.7 Data Protection Policy

2. Introduction to the concept and importance of sharing low-level concerns

2.1 Behaviour which is not consistent with the standards and values of an organisation, and which does not meet the organisational expectations encapsulated in the School's Code of Conduct, needs to be addressed. Such behaviour can exist on a wide spectrum - from the inadvertent or thoughtless, through to that which is ultimately intended to enable abuse.

2.2 All staff need to be informed about and be able to identify concerning, problematic or inappropriate behaviour and understand the importance of sharing concerns when they observe behaviour which violates the School's Code of Conduct.

3. The Low Level Concerns Policy

3.1 The Low Level Concerns Policy enables all staff to share any concerns - **no matter how small** - about their own or another member of staff's behaviour with the Head of Foundation. Safeguarding and promoting the welfare of children is everyone's responsibility.

4. The purpose of the Low Level Concerns Policy

4.1 The purpose of the Low Level Concerns Policy is to create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour which are set out in the School's Code of Conduct are constantly lived, monitored and reinforced by all staff.

5. The aims of the Low Level Concerns Policy?

5.1 The aims of the Low Level Concerns Policy are to:

5.1.1 ensure that staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour - in themselves and others, and the delineation of professional boundaries and reporting lines;

5.1.2 empower staff to share any low-level concerns with the Head of Foundation, and to help all staff to interpret the sharing of such concerns as a neutral act;

5.1.3 address unprofessional behaviour and support the individual to correct it at an early stage;

5.1.4 identify concerning, problematic or inappropriate behaviour - including any patterns - that may need to be consulted upon with (on a no-names basis if appropriate), or referred to, the Local Authority Designated Officer ("LADO");

5.1.5 provide for responsive, sensitive and proportionate handling of such concerns when they are raised; and

5.1.6 help identify any weaknesses in the School's safeguarding system.

6. Definitions

6.1 Who does the policy apply to?

6.1.1 The policy applies to all **staff** whether working in or on behalf of the School, engaged as a paid employee (including supply teacher), worker or contractor, or unpaid member of staff or volunteer. It also includes anyone who is part of the Governing Body.

6.1.2 **Designated Safeguarding Lead (DSL)**

6.1.3 **Governing Body** means those individuals who are responsible for the School's governance i.e. Governors and Trustees.

Details of the individuals currently in these roles can be found at Annexure 1.

6.2 **Allegation that may meet the harm threshold.** The term 'allegation' means it is alleged that an adult who works with children has:

6.2.1 behaved in a way that has harmed a child, or may have harmed a child; and/or

6.2.2 possibly committed a criminal offence against or related to a child; and/or

6.2.3 behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or

6.2.4 behaved or may have behaved in a way that indicates they may not be suitable to work with children.

In terms of managing cases of allegations that may meet the harm threshold, these might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school.

6.3 Concern (including an allegation) that does not meet the harm threshold - i.e. a low-level concern. The term 'low-level concern' does not mean that it is insignificant, it means that an adult's behaviour towards a child does not meet the harm threshold set out above (at paragraph 6.2). A low-level concern is any concern - no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult may have acted in a way that:

6.3.1 is inconsistent with the School's Code of Conduct, including inappropriate conduct outside of work; and

6.3.2 does not meet the allegation threshold or is otherwise not serious enough to consider a referral to the LADO - but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary.

Although it is important that staff feel comfortable with, and are clear about, the concept of low-level concerns, and know what to do if they have such a concern, they do not need to be able to determine in each case whether their concern is a low-level concern, or if it is not serious enough to consider a referral to the LADO, or whether it meets the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination should be made by the Head of Foundation.

The diagram at Annexure 2 further illustrates the distinction between an allegation that may meet the harm threshold, and a concern (including an allegation) that does not meet the harm threshold - i.e. a low-level concern.

6.4 Low Level Concerns Form See Annexure 3.

7. School Culture

7.1 The School promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the School are dealt with promptly and appropriately.

8. Data Protection and Confidentiality / Respecting the rights of all

8.1 The School will always respect the personal data of staff (and others, where they may be identifiable) in implementing the Low Level Concerns Policy and in keeping records of low-level concerns secure.

8.2 The Data Protection Act 2018 includes a specific provision which permits organisations to process even the most sensitive personal data where necessary for the purposes of protecting children from harm. Although sharing of low-level concerns will not always involve legally sensitive categories of data, the safeguarding purpose is the same as that under the School's Child Protection and Safeguarding Policy.

8.3 A proportionate approach must be taken by all to considering what personal data is in fact necessary to share and record by way of low-level concern(s) in each case in order to support the safeguarding purpose and to ensure the information is accurate, fair and as far as possible recorded in neutral terms[9].

8.4 If a member of staff who raises a low-level concern does not wish to be named, then the School will respect their wishes as far as possible. However, staff should be aware that in certain circumstances this anonymity may need to be waived (as explained further in paragraph [10] below).

8.5 All staff are entitled, under data protection law, to ask to see the content of any low-level concern(s) retained by the School under the Low Level Concerns Policy as it relates to them personally and to make any reasonable objection as to the fairness or accuracy of that content. The School will process such requests within the period prescribed by law, subject always to any necessary protection of the rights of third parties and unless any other relevant exemptions apply (including if complying with the request would be likely to prejudice the safeguarding purpose of the Low Level Concerns Policy). If the content of a low-level concern is disputed, it may not be appropriate for the School to delete or alter the original record, but a note may be recorded alongside reflecting the staff member's alternative account or objection(s).

8.6 All personal data processed in connection with the Low Level Concerns Policy will be processed in accordance with the School's Privacy Notices and its Data Protection Policy.

9. Sharing low-level concerns

9.1 It is important that low-level concerns are shared with the Head of Foundation as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it (where the concern relates to a particular incident) - although it is never too late to share a low-level concern.

9.2 If the Head of Foundation is absent for any reason, low-level concerns should be shared with a member of SLT who will ensure they inform the Head of Foundation immediately on their return.

9.3 If any low-level concern relates to the behaviour of the Head of Foundation, it should be referred to the Chair of Governors.

9.4 If there is a conflict of interest in sharing a low-level concern with the Head of Foundation, the low-level concern should be shared with the Chair of Governors, unless there is conflict of interest in doing so, in which case it should be reported directly to the LADO.

9.5 The diagram at Annexure 4 further illustrates who low-level concerns should be shared with.

10. Anonymity

10.1 Staff are encouraged to consent to be named when sharing low-level concerns, as this will help to create a culture of openness and transparency. If the staff member who raises a low-level concern does not wish to be named, the School will respect that person's wishes as far as possible. However, there may be circumstances where the staff member will need to be named (for example, where disclosure is required by a court or local authority, or under a fair disciplinary process) and, for this reason, the School will not promise anonymity to members of staff who share low-level concerns.

11. Self-reporting

11.1 Occasionally a member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, a member of staff may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the School's Code of Conduct. Self-reporting in these circumstances can be positive for a number of reasons, and staff are encouraged to self-report on the basis that:

11.1.1 it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity;

11.1.2 it demonstrates awareness of the expected behavioural standards and self-awareness as to the member of staff's own actions or how they could be perceived; and

11.1.3 crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

11.2 The School's aim is to create an environment where staff are encouraged and feel confident to self-refer.

12. Sharing and recording low level concerns

12.1 The concern can be shared verbally with the Head of Foundation in the first instance, or a written summary of it can be provided to them and with the option of submitting a Low Level Concerns Form at Annexure 3.

12.2 Where the low-level concern is provided verbally, the Head of Foundation will make an appropriate record of the conversation, either contemporaneously or immediately following the discussion and will exercise sound professional judgement in determining what information is necessary to record for safeguarding purposes.

12.3 Where a low-level concern relates to a person employed by a supply agency or a contractor, the School will notify that person's employer so that any potential patterns of inappropriate behaviour can be identified.

13. Responding to low-level concerns

13.1 Once the Head of Foundation has received the low-level concern, they will - not necessarily in the below order but in an appropriate sequence according to the nature and detail of the particular concern shared with them:

13.1.1 Speak to the person who raised the low-level concern (unless it has been raised anonymously).

13.1.2 Speak to any potential witnesses (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted).

13.1.3 Speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted).

13.1.4 If they are in any doubt, seek advice from the LADO - on a no-names basis if necessary.

13.1.5 Review the information and determine whether the behaviour in question:

- (a) is entirely consistent with the School's Code of Conduct and the law;
- (b) constitutes a low-level concern;
- (c) is not serious enough to consider a referral to the LADO but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary;
- (d) when considered with any other low-level concerns previously raised about the same person, could now meet the threshold of an allegation, and should be referred to the LADO/other relevant external agencies, and in accordance with the School's Child Protection and Safeguarding Policy, Part 4 of KCSIE 2023, and the relevant procedures and practice guidance stipulated by Calderdale Safeguarding Children Partnership; or
- (e) in and of itself meets the threshold of an allegation and should be referred to the LADO/other relevant external agencies, and in accordance with the School's Child Protection and Safeguarding Policy, Part 4 of KCSIE 2023, and

the relevant procedures and practice guidance stipulated by Calderdale Safeguarding Children Partnership.

13.1.6 Ensure that appropriate and detailed records are kept of all internal and external conversations regarding the concern, their determination, the rationale for their decision and any actions taken, and retain records in accordance with the Low Level Concerns Policy.

13.1.7 Consider whether the concern also potentially raises misconduct or capability issues - taking advice from HR on a named or no-names basis where necessary - and, if so, refer the matter to HR.

13.2 Staff may also find it helpful to refer to the diagram at Annexure 4.

14. Action taken if the behaviour is entirely consistent with the School's Code of Conduct and the law

14.1 The Head of Foundation will update the individual in question and inform them of any action taken (as above).

14.2 The Head of Foundation will speak to the person who shared the low-level concern - to provide them with feedback about how and why the behaviour is consistent with the School's Code of Conduct and the law.

15. Action will be taken if the behaviour constitutes a low-level concern

15.1 The Head of Foundation will respond in a sensitive and proportionate way - on the one hand maintaining confidence that such concerns when raised will be handled promptly and effectively, whilst on the other hand protecting staff from any potential false allegations or misunderstandings. Any investigation of low-level concerns will be done discreetly and on a need-to-know basis.

15.2 Most low-level concerns by their very nature are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action. Others may be most appropriately dealt with by means of management guidance and/or training. In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised.

15.3 Any such conversation with individuals in these circumstances will include being clear with them as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate.

15.4 Some low-level concerns may also raise issues of misconduct or poor performance. The Head of Foundation will also consider whether this is the case - by referring to the School's disciplinary and/or capability procedure and taking advice from HR on a named or no-names basis where necessary.

15.5 If the Head of Foundation considers that the School's disciplinary or capability procedure may be triggered, they will refer the matter to HR. If HR advises that the School's disciplinary or capability procedure is triggered, the individual will have a full opportunity to respond to any factual allegations which form the basis of capability concerns or a disciplinary case against them.

15.6 Staff should be aware that when they share what they believe to be a low-level concern, the Head of Foundation will speak to the adult who is the subject of that concern (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted) - no matter how 'low' level the concern may be perceived to be, to gain the subject's account - and to make appropriate records (as above), which may be referenced in any subsequent disciplinary proceedings.

15.7 How the School responds to a low-level concern may be different depending on the employment status of the individual who is the subject of the concern - i.e. whether they are an employee or worker to whom the School's disciplinary and/or capability procedure would apply. The School's response will be tailored accordingly.

16. Further action taken if the behaviour:

16.1 is not sufficiently serious to consider a referral to the LADO but nonetheless merits consulting with and seeking advice from the LADO, and on a no-names basis if necessary Then action (if/as necessary) will be taken in accordance with the LADO's advice; or

16.2 when considered with any other low-level concerns that have previously been shared about the same individual, could now meet the threshold of an allegation, or in and of itself meets the threshold of an allegation then it will be referred to the LADO/other relevant external agencies, and in accordance with the School's Child Protection and Safeguarding Policy, Part 4 of KCSIE 2023 and the relevant procedures and practice guidance stipulated by Calderdale Safeguarding Children Partnership.

17. Recording low-level concerns

17.1 The School will retain all records of low-level concerns (including those which are subsequently deemed by the Head of Foundation to relate to behaviour which is entirely consistent with the School's Code of Conduct) in a central low-level concerns file.

17.2 Where multiple low-level concerns have been shared regarding the same individual these will be kept in chronological order as a running record, and with a timeline alongside. These records will be kept confidential and held securely with access afforded

only to a limited number of individuals such as the Head of Foundation, Chair of Governors and HR and Compliance Manager.

18. Reviewing the central low-level concerns file

18.1 The Head of Foundation will review the central low-level concerns file periodically to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. A record of these reviews will be made.

18.2 Where a pattern of behaviour is identified in respect of a specific individual, the Head of Foundation will also consider whether any wider cultural issues are at play that may have enabled the behaviour and/or whether the School should arrange for additional training or a review of any of its policies to reduce the risk of it happening again.

19. Storing low-level concern records

19.1 Low-level concerns will be retained securely by the School for as long as deemed relevant and necessary for a safeguarding purpose unless the School is required to disclose by law (for example, where the threshold of an allegation is met in respect of the individual in question). In most cases, once a staff member leaves the School, any low-level concerns which are held relating to them:

19.1.1 will be retained for the same duration as that individual's personnel file; and

19.1.2 will not be included in any onward reference, except as set out at paragraph 20.

19.2 Low-level concerns will be retained on the School's central low-level concerns file (securely and applying appropriate access restrictions) unless and until further guidance provides otherwise.

20. References

20.1 Where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and is found to be substantiated, it will be referred to in a reference.

20.2 Low-level concerns (or a group of concerns) which have not met the threshold for referral to the LADO which relate only to safeguarding will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance.

21. The role of the Governing Body

21.1 The Head of Foundation will regularly inform the Governing Body about the implementation of the Low Level Concerns Policy and any evidence of its effectiveness, e.g. by including reference to it in any safeguarding reports and providing any relevant data.

Annexure 1 Details of individuals currently in the roles defined within the Low Level Concerns Policy

Head of Foundation - Mrs Sarah Weller (also the DSL)

Deputy DSL - Mrs Emma Beardall

Annexure 2 Spectrum of behaviour

Allegation

Behaviour which indicates that an adult who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child; and/or
- possibly committed a criminal offence against or related to a child; and/or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Low Level Concern

Does not mean that it is insignificant, it means that the adult's behaviour towards a child does not meet the threshold set out above. A low-level concern is any concern - no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult may have acted in a way that:

- Is inconsistent with the School's Code of Conduct, including inappropriate conduct outside of work; and
- Does not meet the allegation threshold or is otherwise not serious enough to consider a referral to the LADO - but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary.

Appropriate Conduct

Behaviour which is entirely consistent with the School's Code of Conduct and the law.

Annexure 3 Example Low Level Concerns Form

Low Level Concerns Form

Please use this form to share any concern - no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult may have acted in a way that:

- is inconsistent with the School's Code of Conduct, including inappropriate conduct outside of work, and
- does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO.

You should provide a concise record - including brief context in which the low level concern arose, and details which are chronological, and as precise and accurate as possible - of any such concern and relevant incident(s) (and please use a separate sheet if necessary).

The record should be signed, timed and dated.

Details of concern

Name of Staff Member	
Department and Role	
Signed	
Date and Time	

Received by	
On (date)	
At (time)	
Action Taken (please specify)	

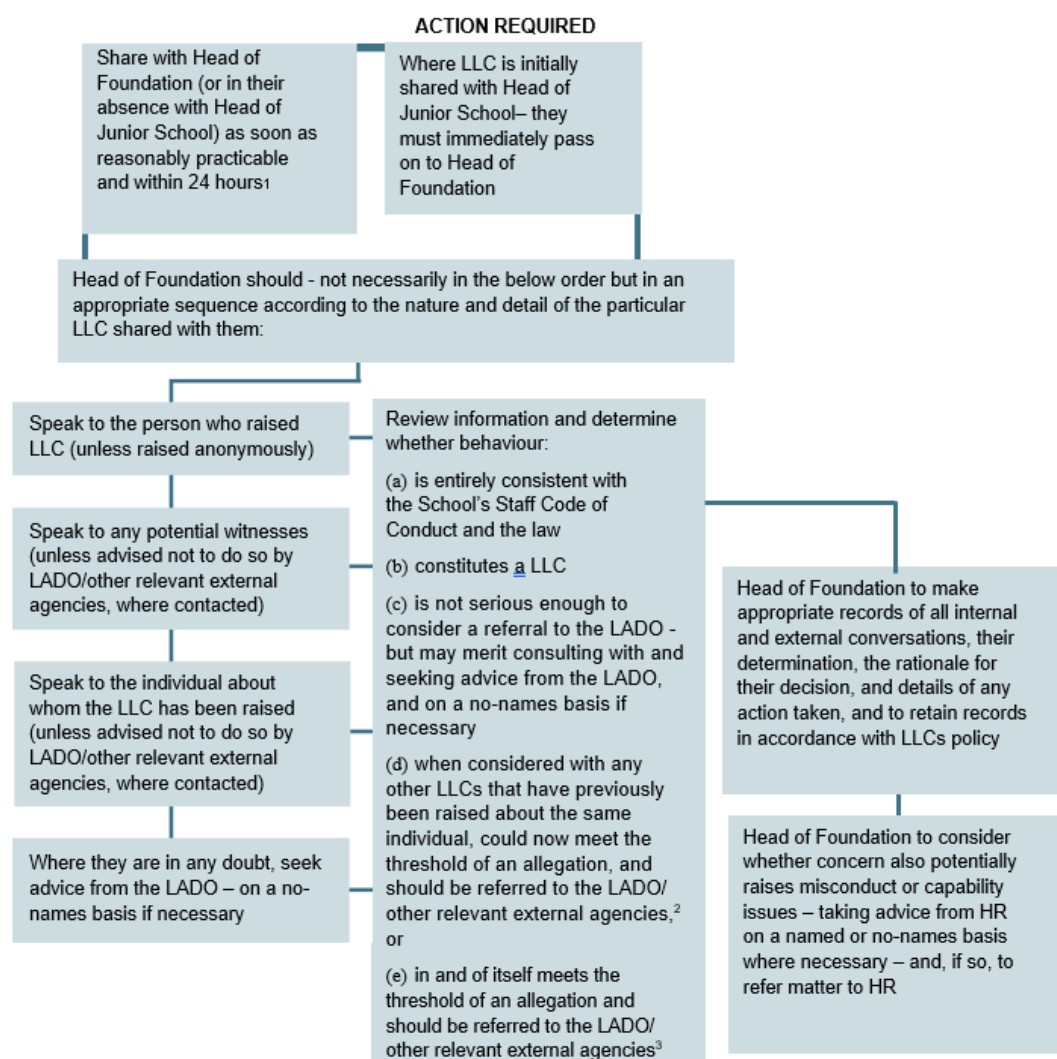
Signed	
Time and Date	

This record will be held securely in accordance with the School's Low Level Concerns Policy. Please note that low level concerns will be treated in confidence as far as possible, but the School may in certain circumstances be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.

Annexure 4 Sharing Low Level Concerns (LLCs) – Action Required By Staff and Head of Foundation

If a member of staff has **an allegation that may meet the harm threshold** - they should follow the procedure in the School's Child Protection and Safeguarding Policy.

If a member of staff has what they **believe** to be a concern that does not meet the harm threshold - i.e. LLC - they should take the below action.



¹ Where the LLC relates to a particular incident

² And in accordance with the [[Safeguarding Policy] [Managing Allegations Against Staff Policy]], and Part 4 of KCSIE, and/or relevant procedures and practice guidance stipulated by Local Safeguarding Partnership

³ As above

Section 9 Compliance

All staff must complete the form [here](#) to confirm they have read, understood and agree to comply with this policy.

APPENDICES TO CHILD PROTECTION AND SAFEGUARDING POLICY:

APPENDIX 1

CHILD PROTECTION CAUSE FOR CONCERN FORM

Date:		Time:	
Name of Child:			
Date of Birth:		UPN Number:	
Reporting Adult:		Role:	
Reporting Adult Signature:		DSL Signature:	

Details of Concern (who, what, where, when):

Facts -

Opinions -

DSL Follow up:

Early Intervention Service Manager Contacted for advice

Yes/No

Early Intervention Panel Referral

Yes/No

MAST Contacted for advice:

Yes/No

MAST Referral:

Yes/No

Time of contact:

Outcome of contact:

Child's CASS Number:

Actions:

Review Date:

APPENDIX 2

Body Map Guidance for Schools

Body Maps should be used to document and illustrate visible signs of harm and physical injuries.

Always use a black pen (never a pencil) and do not use correction fluid or any other eraser.

Do not remove clothing for the purpose of the examination unless the injury site is freely available because of treatment.

***At no time should an individual teacher/member of staff or school take photographic evidence of any injuries or marks to a child's person, the body map below should be used. Any concerns should be reported and recorded without delay to the appropriate safeguarding services, e.g. MAST or the child's social worker if already an open case to social care.**

When you notice an injury to a child, try to record the following information in respect of each mark identified e.g. red areas, swelling, bruising, cuts, lacerations and wounds, scalds and burns:

- Exact site of injury on the body, e.g. upper outer arm/left cheek.
- Size of injury - in appropriate centimetres or inches.
- Approximate shape of injury, e.g. round/square or straight line.
- Colour of injury - if more than one colour, say so.
- Is the skin broken?
- Is there any swelling at the site of the injury, or elsewhere?
- Is there a scab/any blistering/any bleeding?
- Is the injury clean or is there grit/fluff etc.?
- Is mobility restricted as a result of the injury?
- Does the site of the injury feel hot?
- Does the child feel hot?
- Does the child feel pain?
- Has the child's body shape changed/are they holding themselves differently?

Importantly the date and time of the recording must be stated as well as the name and designation of the person making the record. Add any further comments as required.

Ensure First Aid is provided where required and then recorded appropriately.

A copy of the body map should be kept on the child's concern/confidential file.

(This must be completed at time of observation)

Name of Pupil:

.....

Date of

Birth:

.....

Name of Staff:

.....

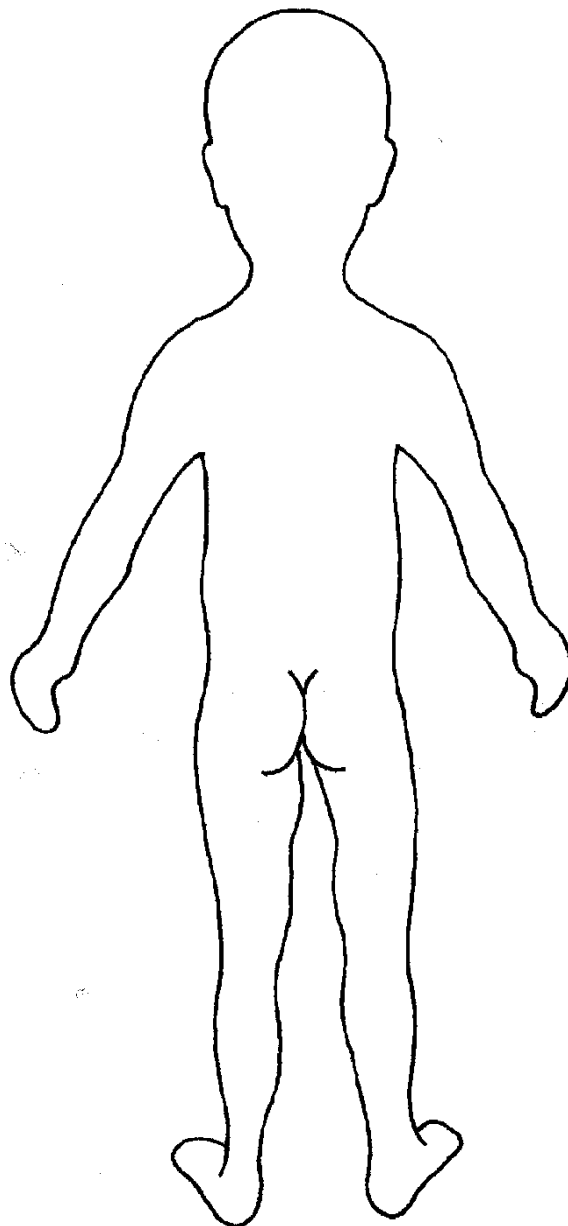
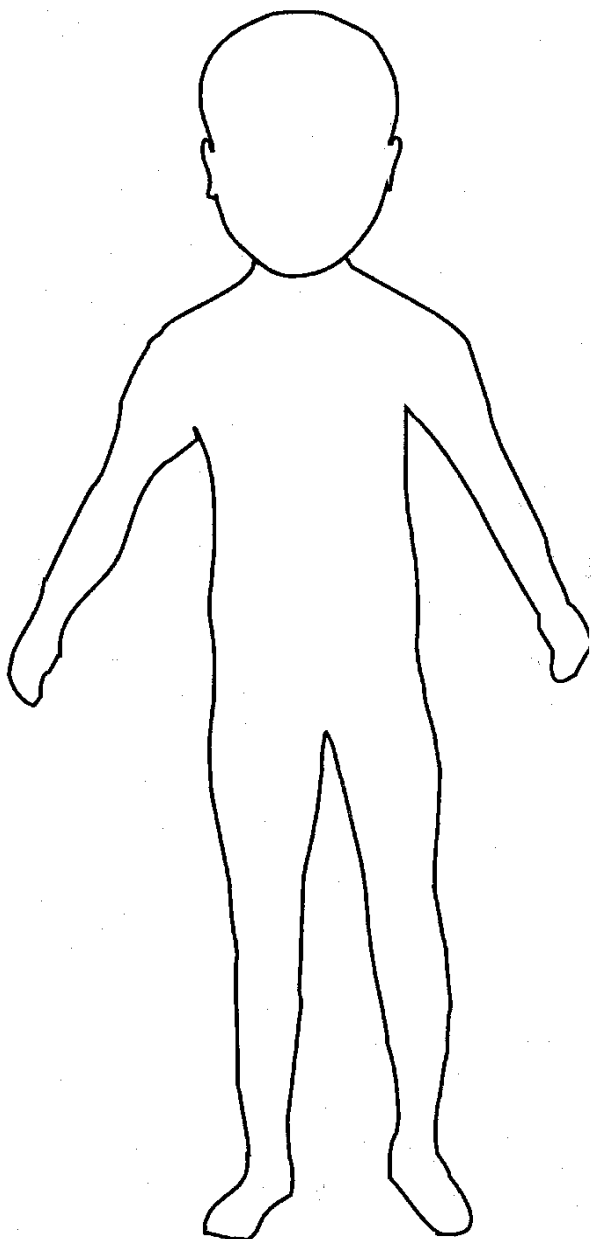
Job

title:

.....

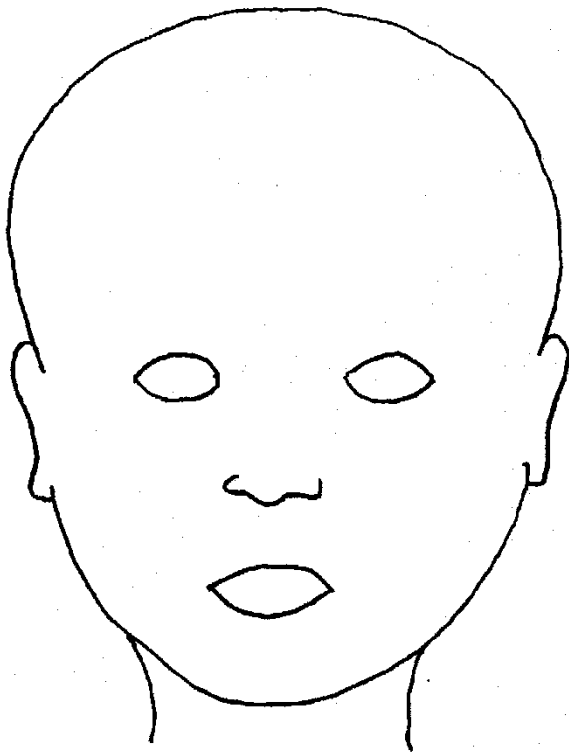
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observation:

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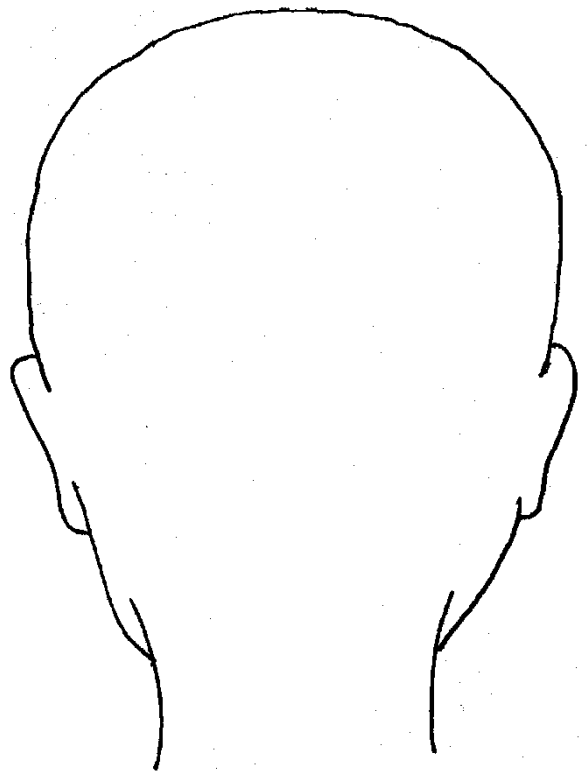


Name of pupil:

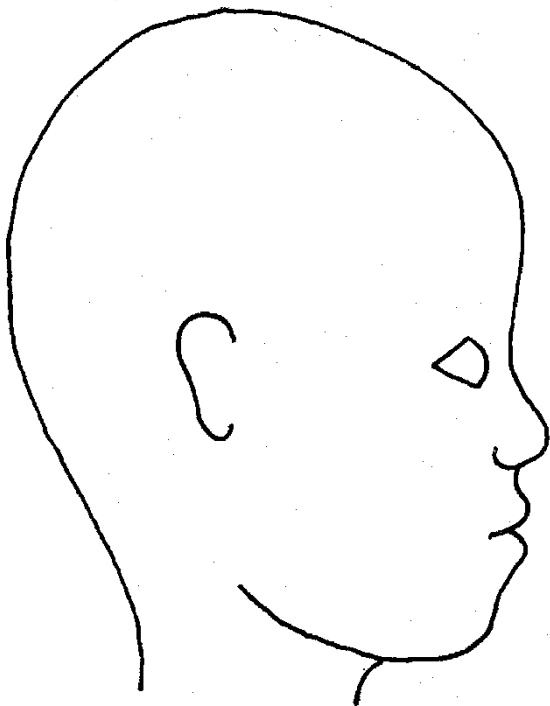
Date and time of
observation:



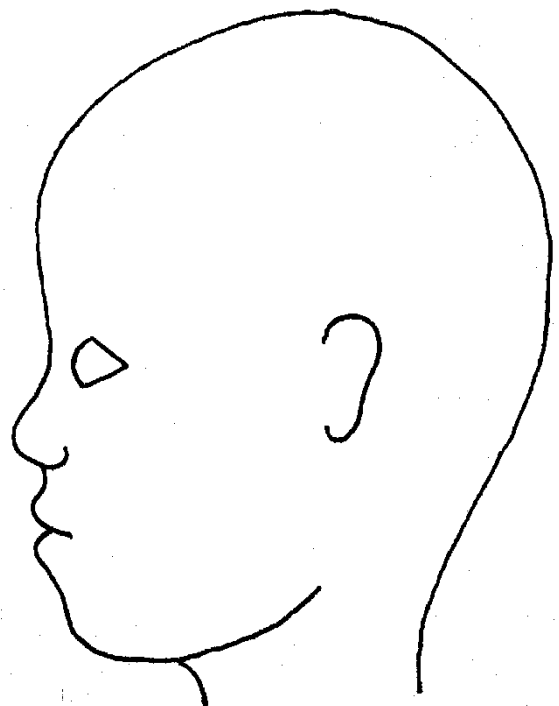
FRONT



BACK



RIGHT



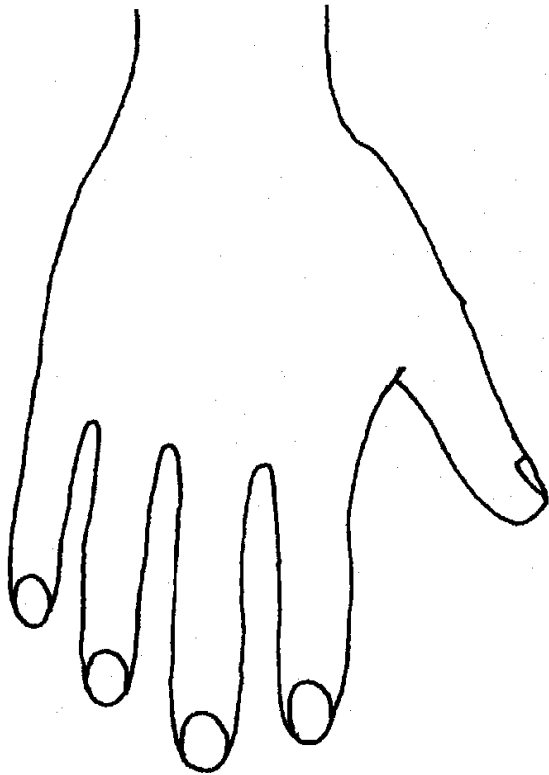
LEFT

.....

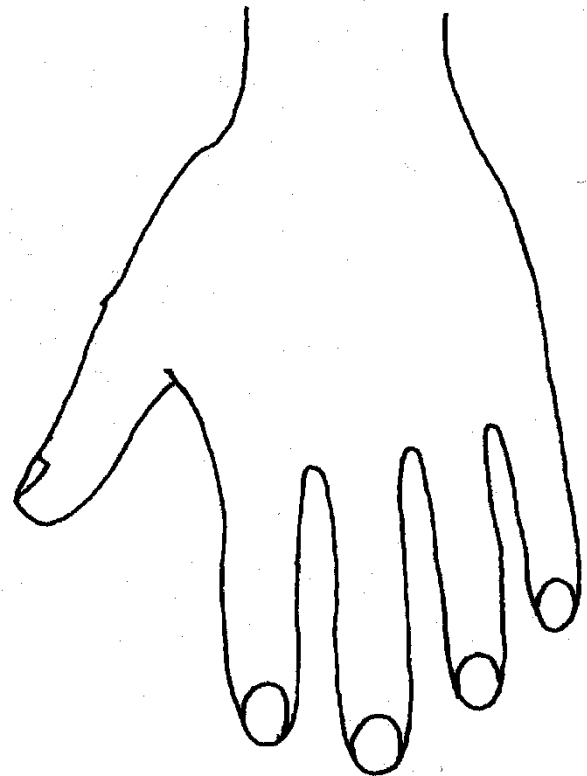
.....

Name of pupil:

Date and time of
observation:



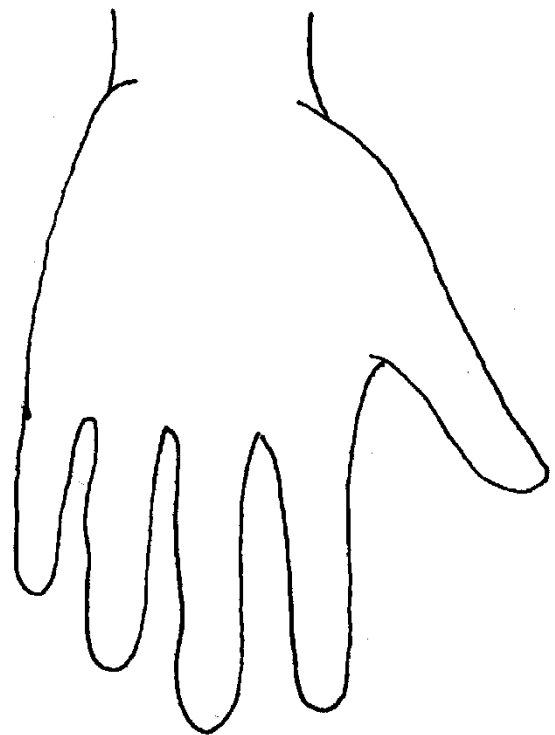
R
BACK



L

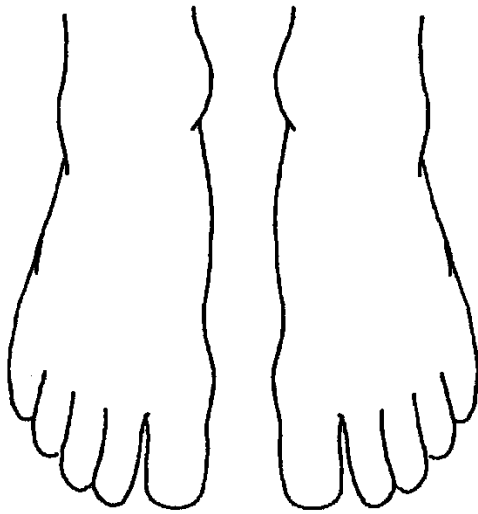


FRONT



Name of Pupil:

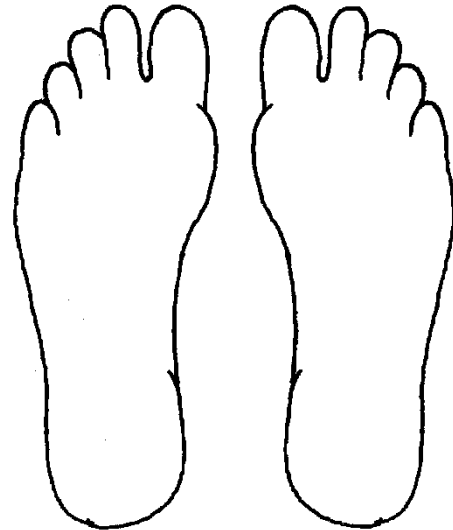
Date and time of
observation:



R

TOP

L



R

BOTTOM

L



R
INNER



L



R
OUTER



L

Name:

Signature:

Job title of staff:

APPENDIX 3

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



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

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

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

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

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

APPENDIX 4

Useful Contacts within the local authority

Children's Social Care

Multi-Agency Screening Team
01422 393336

MAST@calderdale.gov.uk

Disabled Children's Team
01422 394091

DisabledChildrensTeam@calderdale.gov.uk

Emergency Duty Team
01422 288000
(Outside office hours support)

EDT@calderdale.gov.uk

Schools Service

Schools Safeguarding Advisers
Steve Barnes / Frances Turner
07540 672735/ 07354 165887

schoolsafeguarding@calderdale.gov.uk

Education Quality and Strategy
Service Manager Karen Hackett
07540 672167

karen.hackett@calderdale.gov.uk

Senior Education Welfare Officer
Duncan Thorpe
01422 266125
07833 049343

duncan.thorpe@calderdale.gov.uk

Virtual School - Head teacher
Parveen Akhtar
01422 394123
07734 460254

parveen.akhtar@calderdale.gov.uk

Prevent Team

Prevent team email

prevent@calderdale.gov.uk

Managing Allegations

Local Authority Designated Officer (LADO)

Jane Darrington
01422 394055

LADOadmin@calderdale.gov.uk

Whistleblowing - NSPCC helpline

0800 028 0285 from 8am to 8pm Monday to Friday or email help@nspcc.org.uk

Report Sexual Abuse in Education - NSPCC helpline
0800 136 663

Police

West Yorkshire Police

www.westyorkshire.police.uk/report-it

Child Emotional Health and Wellbeing Support

www.openmindscalderdale.org.uk

CalderdaleHousing

www.calderdale.gov.uk/v2/residents/housing/homeless-or-risk-page