

The GLC Safeguarding & Child Protection Policy

For the academic year 2026-2027

This Policy was ratified by the Board of Directors on :	Autumn 2026
This Policy will be reviewed by the GLC Board on :	Autumn 2027

GLC Mission Statement

The GLC’s mission is to develop active and thriving citizens within a diverse, truly fair and equal community.

This will be achieved through:

- High quality teaching that deliberately develops competencies of curiosity, creativity, communication and critical-thinking;
- An inspiring and meaningful curriculum;
- The development of productive relationships by instilling the values of compassion, resilience, responsibility and aspiration to prepare our young people for learning and life;
- A commitment to the wellbeing of our staff;
- A culture of professional generosity, collaboration, challenge and support throughout the GLC;
- The development of effective external partnerships for the benefit and wellbeing of our community.

Equalities Statement

The GLC’s commitment to equality is enshrined in our mission statement to develop ‘active and thriving citizens within a diverse, truly fair and equal community’.

We are a vibrant, innovative and successful organisation: we work hard to be the place of choice to work and to learn. Across the 5 academies of the GLC, we pledge that everyone enjoys an equality of opportunity. We work tirelessly to ensure that individual characteristics including age, ethnicity, socio-economic background, academic ability, disability, gender, religious beliefs, sexual orientation are not discriminated against in any way. We create inclusive environments characterised by mutual respect where difference is celebrated.

DESIGNATED SAFEGUARDING LEAD			
Gateway Academy	Trudi Bryant	07568 101036	ext. 208
Gateway Primary Free School and Growing Little Champions	Natalie Carroll	01375 489094	ext. 307
Herringham Primary Academy	Sam Otto	01375 489860	ext. 505
Lansdowne Primary Academy	Dan Burnett	01375 487200	ext. 405
Tilbury Pioneer Academy	Clare Hall	01375 488420	ext. 606
DEPUTY DESIGNATED SAFEGUARDING LEAD			
Gateway Academy	Kerry Newton	07506 793436/ 489073	
Gateway Primary Free School	Natalie Carroll / Emma Pattison	01375 489094	ext. 306
Herringham Primary Academy	Zoe Singh / Christine Egan	01375 489860	ext. 514
Lansdowne Primary Academy	Anna Sparrow /Nicky Spindler	01375 487200	ext. 404
Tilbury Primary Academy	Victoria Bell	01375 488420	ext. 606
NOMINATED GOVERNOR/ DIRECTOR FOR SAFEGUARDING			
Gateway Academy	Chris Coles	c/o 01375 489000	
Gateway Primary Free School	Anne Fraser	c/o 01375 489094	
Herringham Primary Academy	Anne Fraser	c/o 01375 489860	
Lansdowne Primary Academy	Lynda Pritchard	c/o 01375 487200	
Tilbury Pioneer Academy	Lynda Pritchard	c/o 01375 488420	
GLC Board	Lynda Pritchard	c/o 01375 489000	
NOMINATED DIRECTOR FOR LOOKED AFTER CHILDREN			
Lynda Pritchard		c/o 01375 489000	

KEY CONTACTS WITHIN THE LOCAL AUTHORITY

The **Initial Response Team [IRT]** is available for advice and consultation on Child Protection matters:
01375 652802 or 652634

Local Authority Designated Officer- LADO: 01375 652921

The Safeguarding Partners

Thurrock LA	01375 653813
Clinical Commissioning Group for the LA	01375 365810
Chief Office of police for the LA	101

LADO	01375 652921
MASH [Multi-Agency Safeguarding Hub]	01375 652802

REFERRAL INTO CHILDREN'S SOCIAL CARE

Where schools have **URGENT** and **IMMEDIATE** concerns for the safety and welfare of a child or young person during office hours telephone **01375 372468**

To make **URGENT** referrals **OUT OF OFFICE HOURS** telephone Helpline on 0845 **606 1212**
For all **NON – URGENT** referrals and enquiries telephone **01375 652802 or 652634**

Contents

1. Introduction and context.	4
2. Types of and signs of abuse and how to report them	6
3. The management of safeguarding: roles & responsibilities	19
4. Safeguarding processes & procedures	24
5. The recruitment of staff and volunteers	26
6. Dealing with allegations against existing staff and volunteers who work with children	30
7. Confidentiality and Sharing Information	34
8. Management of the policy	35
 Appendix 1 – Academy specific record of safeguarding training	36
 Appendix 2 - Flow chart diagram showing how concerns are dealt with by each GLC Academy	37
 Appendix 3 - Flow chart of disclosure and barring service criminal record checks and barred list checks	38
 Appendix 4 - Management of suspicious /unexplained injuries /bruising in children for all front line staff	39
 Appendix 5 - Specific safeguarding issues	40

1. Introduction and Context

1.1 Our responsibilities

The Gateway Learning Community [GLC] fully recognises its responsibilities for child protection and safeguarding, and this policy sets out how each GLC Academy will deliver these responsibilities.

This policy should be read in conjunction with:

- Keeping children safe in Education Statutory Revised Guidance for Schools and Colleges, September 2026
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- Working together to safeguard children:
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- What to do if you are worried a child is being abused- Advice for practitioners.
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What to do if you re worried a child is being abused.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf)

GLC staff should also be familiar with the following related policies

- GLC Staff Code of Conduct [and whistleblowing] Policy
- GLC Behaviour Policy
- GLC Anti Bullying Policy
- GLC E-safety Policy

This policy also meets the requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.

1.2 Our Principles

Safeguarding and promoting the welfare of children is defined for the purposes of this policy as: protecting children from maltreatment (including abuse and neglect); preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interest** of the child.'

Children's welfare is our paramount concern. The GLC, governors and trust directors, will ensure that our schools safeguard and promote the welfare of pupils and work together with agencies to ensure that our arrangements identify, assess and support those children who are suffering swiftly.

The GLC community, including staff, governors, directors, parents, families and pupils, have an essential role in making our schools and community safe and secure for all. We will work proactively with all members of our community to ensure that there is a shared understanding of the schools' responsibilities in safeguarding the welfare of all children and that referrals to other agencies are made in a timely manner.

All staff members will be advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.

1.3 Definitions

Safeguarding and promoting the welfare of children means:

- Providing help and support to meet the needs of children as soon as problems emerge;
- Protecting children from maltreatment whether that is within or outside the home, including online;

- Preventing impairment of children's mental and physical health or development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- Taking action to enable all children to have the best outcomes.

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

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

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

Children includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

The local authority (LA)

Integrated care boards (previously known as clinical commissioning groups) for an area within the LA

The chief officer of police for a police area in the LA area

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

Alleged perpetrator(s) and perpetrator(s) are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

1.4 Opportunities to teach safeguarding

School plays a crucial role in preventative education. Preventative education is most effective in the context of a whole-school approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. The GLC has a clear set of values and standards, upheld and demonstrated throughout all aspects of school life. These will be underpinned by the GLC's behaviour policy and pastoral support system, as well as by a planned programme of evidence-based PSHE/RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. Our programme is fully inclusive and developed to be age and stage of development appropriate [especially when considering the needs of children with SEND and other vulnerabilities].

This program will tackle at an age-appropriate stages issues such as:

- Healthy and respectful relationships;
- Boundaries and consent;
- Stereotyping, prejudice and equality;
- Body confidence and self-esteem;
- How to recognise an abusive relationship, including coercive and controlling behaviour;
- The concepts of, and laws relating to- sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support;
- What constitutes sexual harassment and sexual violence and why these are always unacceptable.

1.5 The GLC Policy

There are 6 main elements to the GLC policy, which are described in the following sections:

1. The types of abuse that are covered by the policy;
2. The signs of abuse, exploitation or neglect that staff and volunteers should look out for;
3. Roles and responsibilities for safeguarding;
4. Expectations of staff and volunteers with regard to safeguarding, and the procedures and processes that should be followed, include the support provided to children;
5. How the GLC will ensure that all staff and volunteers are appropriately trained, and checked for their suitability to work within the school;
6. How the policy will be managed and have its delivery overseen.

Through implementation of this policy we will ensure that each GLC Academy provides a safe environment for children to learn and develop. Through induction and refresher training, all staff are made aware of:

- How to recognise signs and symptoms of abuse;
- How to respond to pupils who disclose abuse;
- What to do if they are concerned about a child.

The training will include sections focused on expectations, roles and responsibilities, and will also alert staff to their duties and obligations surrounding the safe use of ICT (including online safety, filtering and monitoring systems). Academies will provide regular updates on the skills and knowledge needed to safeguard children effectively.

2. Types of, and signs of Abuse and how to report them

2.1 Children who may require early help

Staff and volunteers working within a GLC academy should be alert to the potential need for early help for children. Staff and volunteers should consider following the procedures identified for initiating early help [see section 4] for a child who:

- Is disabled and has specific additional needs;
- Has special educational needs [whether or not they have a statutory education, health and care plan];
- Is a young carer
- Is showing signs of being drawn in to antisocial or criminal behaviour, including gang involvement and association with organised crime groups;
- Is frequently missing/goes missing from education, care or from home;
- Is misusing drugs or alcohol themselves;
- Is at risk of modern slavery, trafficking or exploitation.
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- Has returned home to their family from care;
- Is showing early signs of abuse/ or neglect;
- Is at risk of being radicalised or exploited;
- Is a privately fostered child.
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded from schools;
- Has a parent or carer in custody (previously it was 'family member in prison'), or is affected by parental offending.

2.2 How to report any concerns

Clear procedures on reporting any concerns are given to all staff/ volunteers in each GLC academy. This is completed as part of the staff induction training and annual refresher training. Staff will follow the steps outlined on the 6Rs and record concerns on the Child Protection Online Monitoring System [CPOMs].

All child protection and or safeguarding concerns should be reported to the appropriate GLC academy Designated Safeguarding Lead immediately. See Appendix 2 for a flow diagram which explains how all disclosures are dealt with at each GLC academy. Posters identifying the DSL and their deputy will be displayed throughout each GLC academy.

Staff should not assume that a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

All staff must maintain an appropriate level of confidentiality. Staff must never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child.

2.2.1 Mandatory reporting duty for teachers regarding Female Genital Mutilation

Whilst members of GLC staff will speak to the designated safeguarding lead [or deputy] with regard to any concerns about female genital mutilation [FGM], there is a specific **legal** duty on **teachers**. If a **teacher**, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police.

2.3 Early Help

If early help is appropriate, the designated safeguarding lead (or deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.

2.4 Specific safeguarding issues

All GLC staff should have an awareness of safeguarding issues that can put children at risk of harm.

Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting put children in danger.

All GLC staff should be aware that safeguarding issues can manifest themselves via child on child abuse. This is most likely to include, but may not be limited to:

- Bullying (including cyberbullying);
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- Sexual violence and sexual harassment (unwanted conduct of a sexual nature);
- Sexting (also known as youth produced sexual imagery);
- Initiation/hazing type violence and rituals.

All staff should be clear as to the GLC Behaviour Policies (Primary and Secondary) and procedures with regards to **child on child abuse**.

Safeguarding incidents and/or behaviours can be associated with factors outside the GLC academy and/or can occur between children outside the academy. **All staff**, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.' Contextual safeguarding means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors so it is important that schools and colleges

provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

2.4.1 Use of school sites by outside organisations

The GLC will follow our safeguarding policies and procedures, including informing the LADO, if an allegation is made in relation to an incident that happens when an individual or organisation was using GLC premises for the purposes of running activities for children.

2.5 Types and indicators of Child Abuse

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. 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.

Significant harm is the threshold that justifies compulsory intervention in the family in the best interests of the child. Section 47 of the Children Act 1989 states 'where the question of whether harm suffered by a child is significant turns on the child's health or development, his health or development shall be compared with that which could reasonably be expected of a similar child.'

There are four types of child abuse as defined in 'Keeping Children Safe in Education' [September 2023] as follows:

2.5.1 Physical Abuse:

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

Signs of physical abuse

Most children will collect cuts and bruises and injuries, and these should always be interpreted in the context of the child's medical and social history, developmental stage and the explanation given. Most accidental bruises are seen over bony parts of the body, e.g. elbows, knees, shins, and are often on the front of the body. Some children, however, will have bruising that is more than likely inflicted rather than accidental.

Important indicators of physical abuse are bruises or injuries that are either unexplained or inconsistent with the explanation given, or visible on the 'soft' parts of the body where accidental injuries are unlikely, e.g. cheeks, abdomen, back and buttocks. A delay in seeking medical treatment when it is obviously necessary is also a cause for concern. For further guidance on the management of suspicious / unexplained injuries / bruising in children please see Appendix 4.

The physical signs of abuse may include:

- Unexplained bruising, marks or injuries on any part of the body;
- Multiple bruises-in clusters, often on the upper arm, outside of the thigh;
- Cigarette burns;
- Human bite marks;
- Broken bones; scalds, with upward splash marks;
- Multiple burns with a clearly demarcated edge.

Changes in behaviour that can also indicate physical abuse:

- Fear of parents being approached for an explanation;

- Aggressive behaviour or severe temper outbursts;
- Flinching when approached or touched;
- Reluctance to get changed, for example in hot weather;
- Depression;
- Withdrawn behaviour;
- Running away from home.

2.5.2 Emotional Abuse

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

Signs of Emotional Abuse

Emotional abuse can be difficult to identify as there are often no outward physical signs. Indications may be a developmental delay due to a failure to thrive and grow, however, children who appear well-cared for may nevertheless be emotionally abused by being taunted, put down or belittled. They may receive little or no love, affection or attention from their parents or carers. Emotional abuse can also take the form of children not being allowed to mix or play with other children.

Changes in behaviour which can indicate emotional abuse include:

- Neurotic behaviour e.g. sulking, hair twisting, rocking;
- Being unable to play;
- Fear of making mistakes;
- Sudden speech disorders;
- Self-harm;
- Fear of parent being approached regarding their behaviour;
- Developmental delay in terms of emotional progress.

2.5.3 Sexual Abuse

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 or non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse [including via the internet]. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Signs of Sexual Abuse

All staff and volunteers should be aware that adults, who may be men, women or other children, who use children to meet their own sexual needs abuse both girls and boys of all ages. Indications of sexual abuse may be physical or from the child's behaviour. In all cases, children who tell about sexual abuse do so because they want it to stop. It is important, therefore, that they are listened to and taken seriously.

The physical signs of sexual abuse may include:

- Pain or itching in the genital area;
- Bruising or bleeding near genital area;

- Sexually transmitted disease;
- Vaginal discharge or infection;
- Stomach pains;
- Discomfort when walking or sitting down;
- Pregnancy.

Changes in behaviour which can also indicate sexual abuse include:

- Sudden or unexplained changes in behaviour e.g. becoming aggressive or withdrawn;
- Fear of being left with a specific person or group of people;
- Having nightmares;
- Running away from home;
- Sexual knowledge which is beyond their age, or developmental level;
- Sexual drawings or language;
- Bedwetting;
- Eating problems such as overeating or anorexia;
- Self-harm or mutilation, sometimes leading to suicide attempts;
- Saying they have secrets they cannot tell anyone about;
- Substance or drug abuse;
- Suddenly having unexplained sources of money;
- Not allowed to have friends [particularly in adolescence];
- Acting in a sexually explicit way towards adults.

2.5.4 Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. 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.'

2.5.5 Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. It may include a failure to:

- provide adequate food, clothing and shelter [including exclusion from home or abandonment],
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision [including the use of inadequate caregivers];
- ensure access to appropriate medical care or treatment;
- neglect of, or unresponsiveness to, a child's basic emotional needs.

Signs of Neglect

It can be difficult to recognise neglect however, its effects can be long term and damaging for children.

The physical signs of neglect may include:

- Being constantly dirty or 'smelly';
- Constant hunger, sometimes stealing food from other children;
- Losing weight, or being constantly underweight;
- Inappropriate or dirty clothing.

Neglect may be indicated by changes in behaviour which may include:

- Mentioning being left alone or unsupervised;
- Not having many friends;
- Complaining of being tired all the time;
- Not requesting medical assistance and/or failing to attend appointments.

Bullying is also abusive and will include at least one, if not two, three or all four, of the defined categories of abuse. Refer to the GLC's **Anti Bullying Policy**, available for staff on the Intranet and for Parents/others by request.

2.6 Child on Child abuse

All GLC staff should be aware that children can abuse other children [often referred to as peer on peer abuse [now to be called Child on Child Abuse]. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying);
- gender based violence/sexual assaults, harassment and sexting
- racism and other forms of discrimination;
- homophobic, biphobic and transphobic behaviours;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; sexting [also known as youth produced sexual imagery];
- and initiation/hazing type violence and rituals.

Staff must challenge any form of derogatory and sexualised language or behaviour, and be vigilant to sexualised/aggressive touching/grabbing. DfE guidance situates sexual violence, sexual harassment and harmful sexual behaviour in the context of developing a whole-school safeguarding culture, where sexual misconduct is seen as unacceptable, and not 'banter' or an inevitable part of growing up. Advice about tackling and reporting sexual harassment in schools and colleges from Sept 2021 is here:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999239/SVS_H_2021.pdf

It is recognised that there are groups of pupils who would be particularly at risk of derogatory and sexualised behaviours, including girls, pupils who identify as Lesbian, Gay, Bisexual, Transgender/gender questioning children' + (LGBT+), or are perceived by peers to be LGBT+, and pupils with SEND.

There are procedures in place to deal with such issues, with rigorous systems to record, track and analyse incidents. Incidents across the whole spectrum of sexual violence, sexual harassment and harmful sexual behaviours are recorded and analysed in order to reduce the occurrence of such incidents. Children are supported to understand how to treat others with respect. The safeguarding leads in each academy will be familiar with the full guidance from the UK Council for Internet Safety (UKCIS) and recent DfE guidance:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999239/SVS_H_2021.pdf.

2.6.1 Child on child sexual violence and sexual harassment

All GLC staff should recognise that children are capable of abusing their peers. All staff should be vigilant and should report any concerns immediately to the DSL.

- Staff should be aware of the gendered nature of peer to peer abuse [i.e. that it is more likely that girls will be victims and boys perpetrators], but that all child on child abuse is unacceptable and will be taken seriously;
- Staff should be aware of different forms of peer to peer abuse such as:
 - Sexual violence and sexual harassment;
 - Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing harm;
 - Sexting [also known as youth produced sexual imagery];
 - Initiation/ hazing type violence and rituals.

The GLC is aware that the DfE has published detailed advice [Sexual violence and sexual harassment between children in schools and colleges] which includes, what sexual violence and sexual harassment look like, important context to be aware of, related legal responsibilities for schools and colleges and advice on a whole school or college approach to preventing child on child sexual violence and sexual harassment.

2.6.2 Responding to reports of sexual violence and sexual harassment

Reports of sexual violence and sexual harassment will be dealt with on a case-by-case basis, with the designated safeguarding lead [or a deputy] taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police as required.

2.6.3 The immediate response to a report and record keeping

Following a report from a child **all** victims will be reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Circumstances will dictate exactly how reports of child on child sexual violence or sexual harassment will be managed. However, effective safeguarding practice includes (please see the 6 Rs infographic below for a summary):

- Not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further [for example, with the designated safeguarding lead or children's social care] to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;
- Recognising a child is likely to disclose to someone they trust: this could be **anyone** on the school or college staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;
- Listening carefully to the child, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc;
- Considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report [especially if a second member of staff is present]. However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made;
- Only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation;
- Where the report includes an online element, being aware of searching screening and confiscation advice [for schools] and UKCCIS sexting advice [for schools and colleges]. The key consideration is for staff not to view or forward illegal images of a child. The highlighted advice provides more details on what to do when viewing an image is unavoidable.

If a child discloses that he or she has been abused in some way, the member of staff or volunteer should follow this guidance:

When a pupil discloses something, please remember the following:

Receive

Listen actively, open body language, accept, non-judgemental
Use TED (Tell, Explain, Describe)

Reassure

'You've done the right thing by coming to me.'
Reassure child that you have listened and hear what they are saying
Don't promise what can't be delivered

Respond

Tell them what you are going to do and do it
Ensure child is ok before leaving

Report

As soon as possible, report to the Designated Safeguarding Lead (DSL)
via CPOMs. Also refer direct to the DSL for any urgent concerns

Record

VITAL step - only facts, no opinions
Where? When? Who? What?

Review

Take responsibility to follow up any referral with a DSL



All further concerns, discussions and decisions made and the reasons for those decisions must be recorded on CPOMS by the staff involved.

2.6.4 Risk Assessment

When there has been a report of sexual violence, the designated safeguarding lead [or a deputy] will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment will consider:

- The victim, especially their protection and support;
- The alleged perpetrator;
- All the other children (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them;

The risk assessments will be recorded and will be kept under review. At all times, the GLC academy will be actively considering the risks posed to all their pupils and students and putting adequate measures in place to protect them and keep them safe.

The designated safeguarding lead [or a deputy] will ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required.

2.6.5 Action following a report of sexual violence and/or sexual harassment

GLC academies will carefully consider any report of sexual violence and/or sexual harassment. The designated safeguarding lead [or deputy] will have a complete safeguarding picture and will advise on the academy's initial response and further actions. This imperative will be to act to keep the victim safe. Important considerations will include:

- The wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;
- The nature of the alleged incident [s], including: whether a crime may have been committed and consideration of harmful sexual behaviour;
- The ages of the children involved;
- The developmental stages of the children involved;
- Any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- If the alleged incident is a one-off or a sustained pattern of abuse;
- Are there ongoing risks to the victim, other children, adult students or school staff; and
- Other related issues and wider context.

2.6.6 Options to manage the report

There are four likely scenarios to consider when managing any reports of sexual violence and/or sexual harassment.

1. Manage internally

- In some cases of sexual harassment, for example, one-off incidents, the school or college may take the view that the children concerned are not in need of early help or statutory intervention and that it would be appropriate to handle the incident internally, perhaps through utilising their behaviour and bullying policies and by providing pastoral support.
- All responses will be underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated.
- All concerns, discussions, decisions and reasons for decisions will be recorded.

2. Early help

- In line with 1 above, the academy may decide that the children involved do not require statutory interventions, but may benefit from early help.

3. Referrals to children's social care

- Where a child has been harmed, is at risk of harm, or is in immediate danger, the GLC academy will make a referral to Thurrock children's social care.

4. Report to the Police

- Where a report of rape, assault by penetration or sexual assault is made, the starting point is this should be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach. **Any report to the police will be in parallel with a referral to Thurrock children's social care [as above].**
- GLC academies will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that the academy is supporting the child in any decision they take. This should be with the support of children's social care and any appropriate specialist agencies.

2.7 Other reportable forms of abuse which we are thoroughly committed to raising pupil's awareness of include:

2.7.1 Child Sexual Exploitation

Child sexual exploitation [CSE] is a form of sexual abuse that involves the manipulation and/or coercion of young people under the age of 18 into sexual activity in exchange for things such as money, gifts, accommodation, affection or status. The manipulation or 'grooming' process involves befriending children, gaining their trust, and often feeding them drugs and alcohol, sometimes over a long period of time, before the abuse begins. The abusive relationship between victim and perpetrator involves an imbalance of power which limits the victim's options. It is a form of abuse which is often misunderstood by victims and outsiders as consensual. Although it is true that the victim can be tricked into believing they are in a loving relationship, no child under the age of 18 can ever consent to being abused or exploited, [Barnardo's, 2012]. Consent is about having the freedom and capacity to choose. Consent cannot be given even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them.

Some signs may include;

- Underage sexual activity;
- Children who suffer from sexually transmitted infections or who become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who go missing for periods of time or who regularly come home late;
- Children who regularly miss school or who do not take part in education;
- Inappropriate sexual or sexualised behaviour;
- Receiving unexplained gift or gifts from unknown sources;
- Having multiple phones;
- Changes in the way they dress;
- Seen at strange meeting places [hotels or known places of concern];
- Having older boyfriends / girlfriends;
- Self-harming / drug or alcohol misuse;
- Injuries [physical];
- Normal procedures for reporting any concerns would apply for this too.

Sharing of nudes and semi-nudes ('sexting'):

Sharing of nudes and semi-nudes: KCSIE 2026 adopts a safeguarding-led terminology moving away from terms like 'sexting' or 'indecent images' to 'nudes and semi-nudes'. This covers the creation, sending, or posting of nude/semi-nude imagery by young people under 18, including original photos, digitally-altered images, AI-generated content, and deepfakes.

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must not:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL);
- Delete the imagery or ask the pupil to delete it;
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility);
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers;
- Say or do anything to blame or shame any young people involved.

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

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

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

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

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents;
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN);
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent;
- The imagery involves sexual acts and any pupil in the images or videos is under 13;
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

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

Further review by the DSL:

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks. They will hold interviews with the pupils involved (if appropriate).

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

Informing parents/carers:

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

Referring to the police:

If it is necessary to refer an incident to the police, this will be done through [insert details of your existing arrangements, e.g. a safer schools officer, a police community support officer, local neighbourhood police, dialling 101].

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

Curriculum coverage:

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our [relationships education / relationships and sex education] and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is;
- How it is most likely to be encountered;

- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment;
- Issues of legality;
- The risk of damage to people's feelings and reputation.

Pupils also learn the strategies and skills needed to manage:

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

This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first;
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

Sexual consent

- A child under the age of 13 can never consent to any sexual activity;
- The age of consent is 16;

Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. Further information about consent can be found here: [Rape Crisis England & Wales -](#)

2.7.2 Upskirting

Upskirting is typically when a photograph is taken under a person's clothing without them knowing, for sexual gratification or to cause the victim humiliation, distress or alarm. The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019.

2.7.3 Honour Based Violence

So-called 'honour-based' violence [HBV] encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation [FGM] forced marriage or practices such as breast ironing. All forms of so-called HBV are abuse [regardless of motivation] and should be handled and escalated as such.

2.7.4 Gang and Youth / Serious Violence

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include:

- Unexplained gifts/ new possessions- these can indicate children have been approached by/ involved with individuals associated with criminal networks/gangs;
- Increased absence from school;
- Change of friendship/ relationships with others/ groups;
- Significant decline in performance;
- Signs of self-harm/ significant change in wellbeing;
- Signs of assault/ unexplained injuries.

All staff should be aware of the associated risks and should understand the measures within this policy to manage these.

Children and young people who become involved in gangs are at risk of violent crime and as a result of this are deemed vulnerable. Risks associated with gang activity include access to weapons (including firearms),

retaliatory violence and territorial violence with other gangs, knife crime, sexual violence and substance misuse.

Indicators of gang / serious violence activity may be (age in brackets):

- Troublesome (7-9; 10-12) / High daring (10-12) / Positive attitude towards delinquency (10-12) / Previously committed offences (7-9) / Involved in anti-social behaviour (10-12)
- Substance use (7-9) / Aggression (7-9) / Running away and truancy (7-9; 10-12) / Marijuana use (10-12) / Marijuana availability (10-12) / Disrupted family (7-9; 10-12) / Poor supervision (10-12)
- Low academic achievement in primary school (10-12) / Learning disability (10-12) / Peers involved in crime and/or anti-social behaviour (7-9; 10-12)
- Children and young people in the neighbourhood involved in crime and/or anti-social behaviour (10-12)

2.7.5 Female Genital Mutilation

Female Genital Mutilation [FGM] is the partial or total removal of external female genitalia for non-medical reasons or other injury to the female genital organs. Religious, social or cultural reasons are sometimes given for FGM. However, FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Section 5B of the Female Genital Mutilation Act 2003 places a statutory duty upon teachers to report to the police where they discover [either through disclosure by the victim or visual evidence] that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by 'to discover that an act of FGM appears to have been carried out' is used for all professionals to whom this mandatory duty applies.

2.7.6 Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent [if they have learning disabilities, for example]. Staff can contact the Forced Marriage Unit if they need advice or information: contact 020 7008 0151 or email: fmw@fco.gov.uk

2.7.7 Fabricated Illness

Fabricated Illness is when a parent/carer creates or reports the symptoms of illness. This can lead to dangerous treatment not required or damage through the use of drugs or other means to create symptoms.

2.7.8 Preventing Radicalisation

Protecting children from the risk of radicalisation is part of the GLC's wider safeguarding duties, and is similar in nature to protecting children from other harms and abuse. During the process of radicalisation it is possible to intervene to prevent young people from being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

The Counter-Terrorism and Security Act, which received Royal Assent on 12 February 2015, places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from becoming involved with or supporting terrorism ["the Prevent duty"].

Schools are expected to assess the risk of children becoming involved with or supporting terrorism including support for extremist ideas that are part of a terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to support them.

Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE [Child Sexual Exploitation] and CCE [Child Criminal Exploitation] as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- **Go missing and are subsequently found in areas away from their home;**
- **Have been the victim or perpetrator of serious violence (e.g. knife crime);**

The GLC will ensure that children are safe from terrorist and extremist material when accessing the internet at any of its sites.

GLC DSLs will refer children to the Police or the Channel programme where concerns exist. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being involved with or supporting terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

All staff should have awareness of safeguarding issues, some of which are listed below. Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger.

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, information for schools can be found on the TES, MindEd and NSPCC websites. GLC Academy staff can also access broad government guidance on a range of issues via the **GOV.UK website**.

- Bullying including cyber bullying [See the GLC Anti Bullying Policy];
- Children missing in education;
- Child missing from home or care;
- Domestic violence;
- Drugs [See the GLC Anti-Drugs Policy];
- Faith abuse;
- Forced marriage;
- Gangs and youth violence;
- Gender-based violence/ violence against women and girls [VAWG];
- Hate;
- Mental health;
- Relationship abuse;
- Sexting;
- Trafficking.

3. The Management of Safeguarding: Roles and Responsibilities

3.1 Role of the Designated Safeguarding Lead [DSL]

The DSL in each GLC academy will be a member of the senior leadership team who will take the **lead responsibility** for safeguarding and child protection [i.e. even though a Deputy DSL is appointed to each GLC academy, the overall responsibility remains with the DSL]. The DSL will provide advice and support to staff on child welfare and child protection matters; will take part in strategy discussions and agency meetings [or support other staff such as the Deputy DSL to do so] and will contribute to the assessment of children. The name of the Designated Safeguarding Lead will be clearly advertised in the school and on the website, with a statement explaining the school's role in referring and monitoring cases of suspected abuse.

The DSL will liaise with the Head of School to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance – PACE Code C December 2023 [requirements for the detention, treatment and questioning of suspects not related to terrorism in police custody].

Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate **lead responsibility** for child protection, as set out above, remains with the designated safeguarding lead, this **lead responsibility** should not be delegated.

Guidance on when to call the police is outlined in appendix 4

3.1.1 Manage referrals

The designated safeguarding lead is expected to:

- Refer cases of suspected abuse to one of 3 safeguarding partners:
 - Local Authority LADO and MASH;
 - Clinical commissioning group within the LA;
 - Chief office of police for the LA.
- Support staff who make referrals to local authority children's social care;
- Refer cases to the Channel programme where there is a radicalisation concern as required;
- Support staff who make referrals to the Channel programme;
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required;
- Refer cases where a crime may have been committed to the Police as required.

Statutory assessments

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately. Referrals should follow the local Thurrock referral process.

3.1.2 Work with others

The designated safeguarding lead is expected to:

- Liaise with the head of school 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 designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- Liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and SENDCos or the named person with oversight for coaching /SEN in a college) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies;
- Act as a source of support, advice and expertise for all staff;

- At the GLC, we are working in partnership with Essex Police and Thurrock Children's Services to identify and provide appropriate support to pupils who have experienced domestic abuse in their household as part of the Operation Encompass scheme.
 - In order to achieve this, Essex Police will share information with the DSL of medium/high risk domestic violence incidents where one of our pupils has been present.
 - On receipt of any information, the DSL will decide on the appropriate support the pupil requires, this could be silent or overt. All information sharing and resulting actions will be undertaken in accordance with safeguarding and child protection regulations.
 - We will record this information on CPOMS in keeping with the GLC data protection policies.
 - We follow DfE guidance in supporting pupils who may have been abused or witnessed violence through a stable, secure and predictable environment in our schools (<https://www.gov.uk/guidance/domestic-abuse-how-to-get-help>).

3.1.3 Training

The designated safeguarding lead [and deputy] should undergo training to provide them with the knowledge and skills required to carry out the role. The designated safeguarding lead [and deputy] training should be updated at least every two years.

The designated safeguarding lead should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed [this might be via e-bulletins, staff briefings, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments] at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- Understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- Ensure each member of staff has access to, and understands, the school or college's child protection policy and procedures, especially new and part time staff;
- Are alert to the specific needs of children in need, those with special educational needs and young carers;
- Are able to keep detailed, accurate, secure written records of concerns and referrals;
- 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 SEN and disabilities [SEND] face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- Recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges including cognitive understanding. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group;
- Obtain access to resources and attend any relevant or refresher training courses;
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them;
- Ensure the relevant staffing ratios are met, where applicable

3.1.4 Raise Awareness

The designated safeguarding lead should:

- Ensure the GLC's Safeguarding and Child Protection policy are known, understood and used appropriately;
- Ensure the the GLC's Safeguarding and Child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies regarding this;
- Ensure the GLC's Safeguarding and child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this;
- Link with the local LSCB to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

3.1.5 Child protection file

When children leave the school ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENDCOs or the named person with oversight for coaching/SEN in colleges, are aware as required.

In addition to the child protection file, the designated safeguarding lead should also 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 and have that support in place for when the child arrives.

When a pupil joins the academy, as part of the admissions process, pupil safeguarding files will be requested from the previous setting; this is tracked on the admissions and leavers checklist. If a previous school has no safeguarding concerns on the pupil's file, this will be noted on the admission and leavers checklist. Upon receiving pupil files, if there are any noted concerns, including instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. a DSL will liaise with previous school or relevant agencies.

3.1.6 Availability

During term time and holiday provision a designated safeguarding lead [or deputy] will always be available for staff in the academy to discuss any safeguarding concerns. In the unlikely event of the academy's DSL being unavailable, staff will report concerns to a DSL in another academy within the trust or make a direct referral to MASH. Concerns outside of term time will be reported to MASH or the police.

3.2 All GLC staff have responsibility for the following:

- Ensuring that all staff [including non-teaching, site, and support staff] read and understand Part One of Keeping Children Safe in Education 2026 in full. Staff may also refer to the supplementary 'Part One: Overview for All Staff' document for quick reference, but this does not replace reading Part One in its entirety [note: Annex A has been formally removed from KCSIE guidance];
- Ensuring that their child protection training is up to date;
- Providing a safe environment in which children can learn;
- Knowing who each GLC academy's designated safeguarding lead [DSL] for child protection is;
- Raising any concerns with the DSL. **If at any point there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately. Anyone can make this referral;**
- If a teacher, in the course of their work in the profession, discovers that an act of Female Genital Mutilation appears to have been carried out on a girl under the age of 18 the teacher will inform the DSL and report this to the police;
- All staff will know never to promise a child they will not tell anyone about an allegation, as this may ultimately not be in the best interests of the child;
- Maintaining an attitude of 'it could happen here'. When concerned about the welfare of a child, staff members should always act in the interests of the child;

- Knowing each GLC academy's procedures for dealing with children who go missing from education, particularly on repeat occasions, and reporting any such concerns to the designated lead;
- Listening to, and seeking out, the views, wishes and feelings of children and young people;
- Sharing information and working together to provide children and young people with the help they need;
- Referring to the Head of School any concerns about another member of staff, or if the concerns are about the Head of School, referring them to the CEO. Concerns regarding the CEO should be made to the Chair of the GLC Board of Directors;
- Raising concerns about poor or unsafe practice and potential failures in the GLC's safeguarding regime through the GLC Code of Conduct [including Whistleblowing Policy], available on the GLC website;
- Self refer or disclose incidents where accidents or an error of judgement has occurred;
- Recording in writing [generally on CPOMS] all concerns, discussions and decisions made and the reasons for those decisions. If in doubt about recording requirements, staff should discuss with the designated DSL;
- Being aware of Thurrock Safeguarding Procedures, <https://www.thurrocklscp.org.uk/lscp/professionals/set-procedures> and ensuring these procedures are followed;
- Seeking early help where a child and family would benefit from coordinated support from more than one agency via Thurrock's Multi Agency Safeguarding Hub [MASH].

3.3 Directors, Governors and GLC Academy leadership are responsible for:

- Ensuring that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be updated annually;
- Ensuring that there is an effective Safeguarding and Child protection Policy in place together with a staff Code of Conduct and that the policy describes procedures which are in accordance with the government guidance and refer to locally agreed inter-agency procedures put in place by the Safeguarding Partners Board;
- Ensuring that the policy is updated annually and that it is available to the public via the GLC website or in printed form upon request [the GLC will levy a charge for this to cover the cost of printing];
- Ensuring that the policy is provided to all staff, and ensuring all staff are given a mandatory induction, which includes familiarisation with child protection responsibilities and procedures to be followed if anyone has any concerns about a child's safety or welfare;
- Ensuring that policies and procedures adopted by the Board of Directors, particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff;
- Ensuring that each GLC academy has a senior member of the leadership team appointed as the Designated Safeguarding Lead and that they have access to appropriate training, updated every two years;
- The GLC Board will ensure that a Director is nominated to monitor and evaluate the full implementation of this policy. The nominated Director will liaise with the designated officer for Thurrock and any partner agencies in the event of allegations of abuse made against a GLC Head of School; the CEO;
- Ensuring all staff receive the appropriate training, and keep it up to date, in line with advice from Thurrock LSCB;
- Notifying the Children's Social Care department if there are concerns over unexplained absences of a pupil;
- The GLC will safeguard children who go missing from education, particularly on repeat occasions by holding more than one emergency contact number for each child [this goes beyond the minimum legal requirement];
- Managing security within the school and reviewing it annually;
- Ensuring that important policies, such as those for behaviour and bullying, are kept up to date;
- Keeping up to date all child records;
- Having an overview of the numbers of safeguarding and child protection referrals made from the Head of School, who reports [anonymously], to the governors [or GLC Board as appropriate] each term. The CEO will report half termly to the GLC Board about the GLC academies safeguarding activities over the

- previous year;
- Having in place effective ways to identify emerging problems and potential unmet needs for individual children and families;
- Ensuring that the curriculum makes best use of Citizenship and RSHE/ PSHE opportunities to cover safeguarding issues with children, including online safety and sexual health education;
- Ensuring at least one person on any appointment panel has undertaken safer recruitment training;
- Ensuring the adherence to statutory responsibilities to check staff working with children, taking proportionate decisions on whether to ask for checks beyond what is required;
- Ensuring that the disciplinary policy and procedures are in place to handle allegations against members of staff and volunteers;
- Ensuring there are procedures in place to handle allegations against other children;
- Ensuring that there is support available for staff involved in difficult child protection cases/incidents both at each GLC academy and externally through counselling and/or other services;
- Creating a culture of listening to children and taking account of their wishes and feelings, both in individual decisions and in the school's development;
- Ensuring that through the curriculum, pupils know the process of raising a concern [about themselves or a friend/other], that they know their academy's DSL [and deputy], and are aware of other support mechanisms such as Childline etc;
- Appointing a designated officer to promote the educational achievement of Children who are Looked After and to ensure that this person has appropriate training;
- Making this policy available to parents and carers as appropriate;
- Ensuring that our staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children and creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role;
- Ensuring all staff have regular reviews of their own practice to ensure they improve over time;
- Ensuring all records are kept up to date and secure and kept separately from the main pupil file in a locked location or a password protected on CPOMS.

4. Safeguarding Processes and Procedures

Each GLC academy will deliver its responsibilities for identifying and acting on early help needs, safeguarding and child protection in line with the policies and procedures identified in the Thurrock Safeguarding Children's Partnership policies and procedures guidance, available at:

<https://www.thurrocklscp.org.uk/lscp/professionals/set-procedures>

4.1 Early help

Each GLC Academy will also liaise with a wide variety of outside agencies, many of which are able to see pupils weekly. Examples of the wider agencies we liaise with include; multi-agency team/s, careers services, school nurse, Child and Adolescent Mental Health Services [CAMHs], Educational Welfare Officer/s [EWO's], our local Police Community Support Officers [PCSO's], the Police and other services.

KCSIE 2026 places an increased emphasis on early identification and multi-agency working through the local 'Family Help' framework. All staff must remain alert to early indicators of concern—including mental health difficulties, self-harm, or suicidal ideation—to enable early support before statutory social care intervention is required.

We encourage families, pupils and parents to work with these partner agencies also. The provision of early help services should form part of a continuum of help and support to respond to the different levels of need of individual children and families – for more information school staff and volunteers can refer to **Thurrock's 'Early Offer and MASH'** at All initial contacts where staff, governors or volunteers wish to make a request for general advice, information or a service for a child who may be a child with additional or complex needs should be made either by contacting each GLC Academy Designated Safeguarding Lead or the GLC academy SENDCO, or by contacting the local MASH. The Designated Safeguarding Lead for each GLC academy should

be advised of any such contacts, and where possible and appropriate, it should be discussed with the SLT member responsible for child protection and safeguarding:

4.2 Taking action

If at any time it is considered that a child has suffered significant harm or is likely to do so, a referral should be made to Thurrock Council Emergency Duty Team [01375 372 468], or Police Child Abuse Investigation Team on [01277 266 822], or call 999 if you are concerned a child needs immediate protection. If the child has an injury that requires medical attention, the child protection process will not delay the administration of first aid or emergency medical assistance.

Each GLC academy has a clear procedure for reporting. All concerns should be passed to the Designated Safeguarding Lead or their Deputy. If neither are available any other member of SLT should be made aware. See Appendix 2 for a flowchart to explain the procedure.

All concerns will be reported by the end of the day and information will be shared on a need-to-know basis only. For all incidents or suspicions a record on CPOMS must be completed. Issues or concerns will not be discussed with colleagues, friends or family.

4.2.1 Suspecting that a pupil is at risk of harm

There will be occasions when staff may suspect that a pupil may be at risk, but have no 'real' evidence. In these circumstances, staff will try to give the pupil the opportunity to talk.

Staff should use CPOMS to record these early concerns. Following an initial conversation with the pupil, if the member of staff remains concerned, they should discuss their concerns with the Designated Safeguarding Lead.

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the GLC's **Anti-Bullying Policy** where necessary [located in each GLC Website]. However, there will be occasions when a pupil's behaviour warrants a response under child protection rather than anti-bullying procedures.

Each GLC academy acknowledges that some children can be particularly vulnerable or may have an increased risk of abuse and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare. To ensure that all of our pupils receive equal protection, we will give special consideration to children that are considered to be vulnerable.

4.2.2 Pupil disclosure of abuse or radicalisation

If a pupil talks to a member of staff about any risks to their safety or wellbeing, the staff member will need to let the pupil know that they must pass the information on. Staff members will allow them to speak freely and will not ask investigative questions.

The staff member will tell the pupil what will happen next. If the pupil does not agree to see the DSL, it will be the duty of the member of staff to inform the DSL of what has been discussed. If the pupil does agree to go and see the DSL, the staff member will inform the Designated Safeguarding Lead that the child will be coming to see them. The staff member will write up details of the conversation with the pupil as soon as possible on CPOMS and inform the DSL.

4.2.3 Notifying parents

Each GLC academy will normally seek to discuss any concerns about a pupil with their parents. The DSL will make contact with the parent in the event of a concern, suspicion or disclosure.

However, if the academy believes that notifying parents could increase the risk to the child, exacerbate the

problem or compromise the safety of a staff member, advice will first be sought from Children's Social Care.

4.2.4 Referral to Children's Social Care

The DSL will make a referral to Children's Social Care if it is believed that a pupil is suffering or is at risk of suffering significant harm. The pupil [subject to their age and understanding] and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

4.2.5 Reporting directly to child protection agencies

Staff will follow the reporting procedures outlined in this policy. However, they may also share information directly with Children's Social Care, police or the NSPCC if:

- The situation is an emergency and the DSL, their deputy, the Deputy Head of School/Head of School are all unavailable;
- They are convinced that a direct report is the only way to ensure the pupil's safety.

4.2.6 The use of 'reasonable force'

There are circumstances when it is appropriate for staff in the GLC to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

The Government believes that the adoption of a 'no contact' policy at a school or college can leave staff unable to fully support and protect their pupils and students. It encourages academies to adopt sensible policies, which allow and support their staff to make appropriate physical contact. The decision on whether or not to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned and should always depend on individual circumstances.

When using reasonable force in response to risks presented by incidents involving children with SEN or disabilities or with medical conditions, schools should in considering the risks carefully recognise the additional vulnerability of these groups. They should also consider their duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination and their Public Sector Equality Duty by planning positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents and carers, schools and colleges can reduce the occurrence of challenging behaviour and the need to use reasonable force. Please refer to the GLC Safer Handling Policy for further details.

5. The Recruitment of Staff and Volunteers

Each GLC academy will ensure that Safer Recruitment practices are always followed. Every interview panel will have at least one member who has a current certificate in Safer Recruitment. Every job description, person specification and job advertisement will have a clear statement about the safeguarding responsibilities of the post holder. The GLC website will also contain a statement on safeguarding.

We will check on the identity of candidates, follow up references with referees and scrutinise applications for gaps in employment. We will ensure that safeguarding considerations are at the centre of each stage of the recruitment process. In addition, as part of the shortlisting process the GLC will carry out an online search as part of our due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the GLC might want to explore with the applicant at interview.'

We will ensure that all staff involved in recruitment are aware of government guidance on safer

recruitment and that its recommendations are followed.

Any offer of appointment made to a successful candidate [including one who has lived or worked abroad] will be conditional on satisfactory completion of the necessary pre-employment checks.

The types of checks undertaken will be in accordance with the guidance given in the revised Keeping Children Safe in Education guidance [September 2026]. When appointing new staff, the GLC will:

- Verify a candidate's identity;
- Obtain an enhanced DBS certificate [including barred list information], for those who will be engaging in regulated activity;
- Obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available;
- Verify the candidate's mental and physical fitness to carry out their work responsibilities [a job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role];
- Verify the person's right to work in the UK;
- Verify professional qualifications, as appropriate;
- Check that a person taking up a management position is not subject to a Section 128 direction made by the Secretary of State;
- Seek professional references to obtain objective and factual information to support appointment decisions. If concerns arise from the reference, the referee will be contacted to provide further clarification as appropriate;
- Ensure that a candidate is not subject to a prohibition order issued by the Secretary of State, or any sanction or restriction imposed [that remains current] by the GTCE before its abolition in March 2012.

An enhanced DBS Certificate is required and will be obtained from the candidate before they start work. In the event that a DBS application does not complete in time, a start date can be confirmed providing all other employment checks have been completed and a risk assessment is in place. Copies of documents used to verify the successful candidate's identity, right to work and required qualifications will be kept on their personnel file as per the statutory advice. Copies of DBS certificates and records of criminal information disclosed by the candidate are covered by UK GDPR/DPA 2018 Article 10.

See **Appendix 3** for the flowchart of disclosure and barring service criminal records and barred list checks. Each GLC academy will carry out all relevant checks if it is concerned about an existing member of staff and **refer to the DBS anyone who has harmed, or poses a risk of harm to a child or vulnerable adult.**

Each GLC academy will keep a single central record in accordance with the regulations given in the Keeping Children safe in Education [September 2023] document. The CEO and directors/governors will audit on a termly basis.

The GLC will ensure that agencies and third parties supplying staff provide us evidence that they have made the appropriate level of safeguarding checks on individuals working in our schools.

5.1 Single Central Record (SCR)

Each GLC academy will maintain a single central record of pre-appointment checks, referred to in the Regulations as the register. The single central record will cover the following people:

- All staff, including teacher trainees on salaried routes, and supply staff who work for the GLC and
- All governors, members and trustees of the academy trust.

The bullet points below set out the minimum information that will be recorded in respect of staff members [including teacher trainees on salaried routes]. The record must indicate whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained:

- An identity check;

- A barred list check;
- An enhanced DBS check/certificate;
- A prohibition from teaching check;
- A section 128 check [for management positions as set out in paragraph 120-121 for independent schools [including academies and free schools]];
- Further checks on people who have lived or worked outside the UK; this would include recording checks for those European Economic Area [EEA];
- A check of professional qualifications, where required;
- A check to establish the person's right to work in the United Kingdom;
- For supply / agency staff, the GLC will also include whether written confirmation has been received that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, and the date that confirmation was received and whether any enhanced DBS certificate check has been provided in respect of the member of staff.

There is no requirement for multi-academy trusts [MATs] to have separate single central records, but schools should ensure the record is securely stored and easily accessible to those who need to see it, including Ofsted inspectors.

The single central record will be kept in electronic form and checked termly by leaders and governors.

5.2 Individuals who have lived or worked outside the UK

Individuals who have lived or worked outside the UK will undergo the same checks as all other staff. In addition, the GLC will make further checks as appropriate so that any relevant events that occurred outside the UK can be considered. The GLC will follow the government's guidance on the requirements for overseas-trained teachers from the EEA to teach in England, and the award of qualified teacher status for teachers qualified in Australia, Canada, New Zealand and the United States of America.

5.3 Existing staff

If there are concerns about an existing staff member's suitability to work with children, the GLC will carry out all relevant checks as if the person were a new member of staff. Similarly, if a person working at the GLC moves from a post that was not regulated activity into work which is considered to be regulated activity, the relevant checks for that regulated activity must be carried out.

The GLC recognises its' a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- The harm test is satisfied in respect of that individual;
- The individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence;
- The individual has been removed from working [paid or unpaid] in regulated activity, or would have been removed had they not left.

The GLC recognises that the legal duty to refer applies equally in circumstances where an individual is deployed to another area of work that is not regulated activity, or they are suspended.

If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers or contractors) that does not meet the harm threshold, then this should be shared [and recorded in writing] with the DSL.

5.4 Volunteers

Under no circumstances will the GLC allow a volunteer, in respect of whom no checks have been obtained, to be left unsupervised or allowed to work in regulated activity.

In accordance with KCSIE 2026, teaching, training, instructing, caring for, or supervising children on a regular basis is classified as regulated activity, regardless of whether the volunteer is supervised by another member of staff. All volunteers undertaking regulated activity must undergo an Enhanced DBS check with Children's Barred List information prior to commencing their role.

The GLC will undertake a risk assessment and use professional judgement and experience when deciding whether to obtain an enhanced DBS certificate for any volunteer not engaging in regulated activity. In doing so the GLC will consider:

- The nature of the work with children;
- What is known about the volunteer, including formal or informal information offered by staff, parents and other volunteers;
- Whether the volunteer has other employment or undertakes voluntary activities where referees can advise on suitability.

The GLC Head of School will determine whether a volunteer is considered to be supervised. In making this decision, and where an individual is supervised, to help determine the appropriate level of supervision the Head of School must have regard to the statutory guidance issued by the Secretary of State. This guidance requires that, for a person to be considered supervised, the supervision must be:

- By a person who is in regulated activity;
- Regular and day to day;
- Reasonable in all the circumstances to ensure the protection of children.

Volunteers will have a Safeguarding briefing before starting their work.

The DBS cannot provide barred list information on any person, including volunteers, who are not in, or seeking to engage in regulated activity.

5.4.1 Contractors

GLC School Support Managers [SSMs] or designated site staff will ensure that any contractor, or any employee of the contractor, who is to work at a GLC academy has been subject to the appropriate level of DBS check. Contractors engaging in regulated activity will require an enhanced DBS certificate [including barred list information]. For all other contractors who are not engaging in regulated activity, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check [not including barred list information] will be required. In considering whether the contact is regular, it is irrelevant whether the contractor works on a single GLC site or across a number of sites.

Under no circumstances will a contractor in respect of whom no checks have been obtained be allowed to work unsupervised, or engage in regulated activity. The GLC will determine the appropriate level of supervision depending on the circumstances.

If a contractor working at the GLC is self-employed, the GLC will consider obtaining the DBS check, as self-employed people are not able to make an application directly to the DBS on their own account.

The SSM or designated site staff for each GLC academy will always check the identity of contractors and their staff on arrival at the school or college.

5.4.2 Visitors

The GLC does not have the power to request DBS checks and barred list checks, or ask to see DBS certificates, for visitors [for example children's relatives or other visitors attending a sports day etc]. Heads of School will use their professional judgement about the need to escort or supervise visitors.

All staff members have a responsibility to ensure our buildings and grounds are secure and for reporting concerns that may come to light.

We check the identity of all visitors and volunteers coming into school. Visitors are expected to sign in and out in the office visitors' log and to display a visitor's badge while on the school site. Any individual who is not known or identifiable will be challenged for clarification and reassurance.

The school will not accept the behaviour of any individual, parent or anyone else, that threatens school security or leads others, child or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the school site.

5.4.3 Alternative Provision

If a GLC academy places a pupil at a provider of alternative provision, the academy continues to be responsible for the safeguarding of that pupil, and should be satisfied that the provider meets the needs of the pupil. GLC academies will obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of its own staff.

Key staff members will liaise with the provider regularly, including daily checks for attendance and ½ termly in regards to progress. Where safeguarding, pastoral or SEND meetings are needed these will be held collaboratively, in the timeframes set out. A member of GLC staff will also undertake regular visits to the AP to ensure that relationships are maintained with the pupil, and that The GLC is confident about what provision is typically provided.

5.4.4 Adults who supervise children on work experience

The Gateway Academy will ensure that all work placement providers have policies and procedures in place to protect children from harm.

Barred list checks by the DBS might be required on some people who supervise a child under the age of 16 on a work experience placement. The Academy will consider the specific circumstances of the work experience. Consideration will be given in particular to the nature of the supervision and the frequency of the activity being supervised, to determine what, if any, checks are necessary. These considerations will include whether the person providing the teaching/training/instruction/supervision to the child on work experience will be:

- Unsupervised themselves; and
- Providing the teaching/training/instruction frequently [more than three days in a 30 day period, or overnight].

If the person working with the child is unsupervised and the same person is in frequent contact with the child, the work is likely to be regulated activity. If so, the Academy will ask the employer providing the work experience to ensure that the person providing the instruction or training is not a barred person.

Students who complete their working experience in a GLC academy will have a safeguarding briefing. Where there are safeguarding concerns for a pupil on work experience reports will be made to the safeguarding team at the home school or place of education.

6. Dealing with allegations against existing staff and volunteers who work with children

If staff members have concerns about other staff members, then this should be referred to the Head of School. Where there are concerns about the Head of School, this should be referred to the CEO and in-turn concerns about the CEO should be referred to the Chair of the GLC Board. Staff may consider discussing concerns with the academy's designated safeguarding lead and make any referral via them.

Staff members must report concerns if a colleague has:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child; or

- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children.

This relates to members of staff and volunteers who are currently working in any school or college regardless of whether the school or college is where the alleged abuse took place. Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse will also be referred to the police.

6.1 Thurrock Local Authority has published guidance in-line with the 3 Rs: Recognise, Respond, Responsibility as follows:

6.1.1 Recognise

When someone working with children and young people in a paid or voluntary position has acted in a way that has or may have:

1. *Harmed a child;*
2. *Committed an offence against a child, or*
3. *Behaved towards a child or children in a way that indicates they may pose a risk or harm to children.*

That member of staff must take action to safeguard the child. This is in the case whether you witness something first hand, or as a result of a complaint or allegation made by another child or adult.

6.1.2 Respond

Do Not

- *Ignore your concerns, the complaint or allegation;*
- *Start to investigate the matter yourself.*

Do

- *Immediately discuss your concerns with your supervisor and/ the DSL in accordance with the safeguarding policy and procedures;*
- *Where the concerns meet one or more of the three criteria, report the concerns to the Local Authority Designated Officer [LADO] within one working day;*
- *In an emergency where a child has suffered harm, follow child protection procedures and contact the police and social care immediately;*
- *Record what you have witnessed and/ or all information that has been shared with you in detail including the adult and child/rens personal details.*

6.1.3 Responsibility

We are ALL responsible for keeping children safe in all environments.

- *You and/ or your employer may be asked to attend a multi-agency meeting chaired by the LADO of Children's Social Care;*
- *If you are invited to a meeting you should make every effort to attend as your contribution will be vital to the safeguarding of children;*
- *It is the responsibility of the LADO to oversee the management of ALL allegations against people in a position of trust working with children directly or indirectly in a paid or voluntary position, where the nature of the allegation meets any of the three criteria listed in 6.1.1;*
- *Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.*

Where any member of the GLC staff or any volunteer has concerns that a person has caused harm, or poses a future risk of harm to vulnerable groups, including children they must take action in accordance with the GLC Code of Conduct Policy.

Under its duty of care for its employees, each GLC academy will ensure they provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended.

Each GLC academy will ensure its obligations for confidentiality when an allegation has been made. Any allegation will be managed under the relevant GLC Policies.

6.1 Managing situations and exit arrangements

Each GLC academy will ensure compliance with the guidance and regulations contained in the appropriate sections of the Keeping Children safe in Education [September 2023] guidance when dealing with allegations of abuse made against a teacher or other member of staff:

- Resignation and 'settlement agreements';
- Record keeping;
- References;
- Timescales;
- Oversight and Monitoring Suspension;
- Information sharing;
- Following a criminal investigation or prosecution;
- On conclusion of a case;
- In respect of malicious or unsubstantiated allegations.

6.2 Training for all staff and pupils to raise awareness and increase understanding

Every year all GLC staff at each GLC academy [including non-teaching and volunteers] will undertake the Safeguarding and Child Protection training. This is recorded and logged by SSMs or by the HR lead. All GLC staff are informed clearly on how to report anything of concern to their DSL immediately.

See **Appendix 2** for a flow diagram of how concerns are dealt with at each GLC academy. In addition, all staff members will receive safeguarding and child protection updates [for example, via email and staff briefings] as required to provide them with the relevant skills and knowledge to safeguard children effectively.

All staff will be aware of the early help process, and understand their role in it. This includes identifying emerging problems, liaising with the designated safeguarding lead, sharing information with other professionals to support the early identification and assessment.

The GLC is thoroughly committed to teaching all our pupils about risks and placing emphasis on them learning about how to minimise risk. This is done through the curriculum programme and through each GLC academy engaging in national and local initiatives such as; anti-bullying awareness days, e-safety programmes, and other programmes which raise their awareness and increase their understanding.

6.2.1 Anti-bullying

Each GLC academy marks anti-bullying week during November annually and raises pupil's awareness of bullying issues and how to tackle them effectively.

If any pupil / member of staff / parent / carer has a concern about bullying, they should report it to each GLC academy DSL or the Deputy DSL or any member of Leadership.

6.2.2 Online safety

We are thoroughly committed to improving pupils' online safety awareness at each GLC academy and providing our pupils with a safe environment in which to learn. Our 'Acceptable use policy' is signed by all pupils and staff.

If a pupil, parent/carers or member of staff has a concern relating to e-safety pupils are encouraged to report it. They can report it directly to the Head of School at each GLC academy.

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

- Content – being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories
- Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying;
- Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above, we will educate pupils about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring.
- All staff members will receive refresher training as required and at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety.

Artificial intelligence (AI)

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

The Gateway Learning Community recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

The Gateway Learning Community will treat any use of AI to access harmful content or bully pupils in line with this policy and our [anti-bullying/behaviour] policy.

Staff should be aware of the risks of using AI tools while they are still being developed. Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education. In line with the updated 4Cs framework [KCSIE 2026], staff must be alert to risks associated with Generative AI tools. This includes Contact risks [such as harmful interactions with AI chatbots or simulated companion systems] and Conduct/Content risks [including the creation, sharing, or alteration of explicit images, deepfakes, and AI-generated nudes]. The GLC applies filtering and monitoring standards to Generative AI applications in line with DfE product safety expectations.

6.2.3 Online safety: GLC Monitoring of ICT usage

The GLC has deployed a multi-layered filtering and blocking system across all GLC academies to ensure that all reasonable measures are taken to limit pupils' exposure to any risks from the GLC's IT system. The 3 levels of defence are as follows:

1. The GLC firewall which filters out any pushing websites which can affect all system users;
2. The internal pupil filtering service offered by Smoothwall;
3. Web-filtering categories enabled on the antivirus solution called Sophos.

Activity across the GLC is reviewed weekly and any suspicious activity is investigated further. Where it is deemed necessary, a referral will be made to the GLC academy's Designated Safeguarding Lead to formally investigate.

With recent additional requirements to increase the level of filtering and blocking to include active monitoring of students' activity, a monitoring application has been developed to record any hits on other students when a student types a keyword that is in the restricted list.

When a GLC student types a restricted word a capture is recorded. A report is generated weekly and checked by a senior staff member. A report will be completed for directors on a half termly basis to keep them informed on any issues that have arisen. Our monitoring strategies are reviewed regularly to ensure that they are in line with safeguarding requirements and recommended best practice.

The designated lead will monitor the blocked website report to see if there are any trends of blocked sites that need to be unblocked for the sake of students' education. Furthermore, monitoring the block lists to see if there is a trend of pattern of website use that could warrant further investigation in terms of a safeguarding or Prevent Duty referral. The academy's DSL and leadership teams will ensure that relevant staff are aware of the systems in place and know how to escalate any concerns.

In accordance with KCSIE 2026, the effectiveness of the GLC's filtering and monitoring systems and processes will be formally reviewed at least once every academic year.

Clear accountability for filtering and monitoring is assigned to a named member of the Senior Leadership Team [SLT], working in close coordination with the Designated Safeguarding Lead [DSL] and IT technical staff. The DSL's role and job description explicitly include maintaining an up-to-date understanding of filtering and monitoring systems. Written records of all filtering checks across all devices and locations will be maintained and audited regularly.

6.2.4 Photography and images

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place.

To protect pupils, we will:

- Secure their, or their parent's consent annually [in-line with the GLC GDPR policies] for photographs to be taken or published [for example, on our website or in newspapers or publications];
The Data Protection Act and UK GDPR **do not** prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy. Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare of children.;
- Use only the pupil's first name with an image;
- Ensure pupils are appropriately dressed;
- Encourage pupils to tell us if they are worried about any photographs that are taken of them.

Parents, carers or relatives may only take still or video photographic images of pupils in their GLC academy or on academy-organised activities with the prior consent of the academy and then only in designated areas. If parents do not wish their children to be photographed or filmed and express they will not give their consent and their rights will be respected.

Staff use of mobile phones and other personal devices:

- GLC staff should only use mobile phones at break, lunchtimes and in restricted areas when they are not in contact with pupils, unless they have the permission of the Head of School;
- Personal devices should be password protected;

- Staff should not use their personal mobile phone or any other personal device to contact pupils, parents and carers or to take photos and videos of pupils under any circumstances.
- Designated school phones only should be used;

6.2.5 Mobile phones and smart technology

In accordance with KCSIE 2026 and statutory DfE guidance, the GLC operates as a mobile phone-free environment by default across the entire school day.

Pupils are prohibited from accessing mobile phones, smartwatches, or other smart devices capable of cellular communication or internet recording during lessons, movement between classes, breaktimes, and lunchtimes. Any exceptions [such as specific medical needs, young carers, or limited permissions for Sixth Form students in designated spaces] must be formally agreed upon by the Head of school and DSL. Misuse of mobile devices or unauthorised access will be managed in line with the Trust's Behaviour Policies and Safeguarding procedures.

7. Confidentiality and sharing information

Staff should only discuss concerns with the DSL, Head of School or Chair of Governors [depending on who is the subject of the concern]. That person will then decide who else needs to have the information and they will disseminate it on a need-to-know basis.

All staff will understand that **child protection issues warrant a high level of confidentiality**, not only out of respect for the pupil and staff involved but also to ensure that anything being released into the public domain does not compromise evidence.

All staff members have a professional responsibility to share information with other agencies in order to safeguard children. We will ensure that staff are confident about what they can and should do under the law, and how to obtain consent to share information and when information can be shared without consent.

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

We will develop and promote effective working relationships with other agencies, including agencies providing early help services to children, the police and Children's Social Care. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

7.1 Storage and handling of records

Child protection information will be stored and handled in line with the principles set out in the Data Protection Act 1998 and the academy's **Data Protection Policy**.

Any written information will be stored in a locked facility accessed only by the Head of School and DSL. CPOMS will be password protected and only made available to relevant individuals.

Every effort will be made to prevent unauthorised access.

Child protection information will be stored separately from the pupil's academy file and the academy file will be 'tagged' to indicate that separate information is held. If such records need to be sent to a new school or academy they will be sent separate from the pupil's file and under a confidential cover.

Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the

Head of School or DSL.

The Data Protection Act does not prevent academy staff from sharing information with relevant agencies, where that information may help to protect a child.

Where children leave the GLC, the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and **within 5 days** for an in-year transfer or within the **first 5 days** of the start of a new term to allow the new school or college to have support in place for when the child arrives. The designated safeguarding lead should ensure secure transit, and confirmation of receipt should be obtained. Where a child has an open Family Help plan, ongoing local authority intervention, or known risk factors, the DSL will arrange a direct handover with the receiving school's DSL prior to transfer. For schools, this should be transferred separately from the main pupil file. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and special educational needs co-ordinators [SENCO's] or the named persons with oversight for special educational needs and disability [SEND] in a college, are aware as required.

8. Management of the Policy

Each GLC academy will at all times adhere fully to the statutory guidance in place from the Department of Education issued under Section 175 of the Education Act 2002, the Education [Independent School Standards] Regulations 2014 and the Education [Non-Maintained Special Schools] [England] Regulations 2011, Currently:

- **Keeping children safe in education:** Statutory guidance for schools and colleges [September 2023] and the departmental advice:
 - **What to do if you are worried a child is being abused** – Advice for practitioners [July 2023]
- Nothing written in this policy overrides the Academy's duties under such legislation.

The GLC Board of Directors will oversee the policy, ensure its implementation and review its content on an annual basis.

The Chief Executive Officer will report on safeguarding activity and progress within the school to the Board of Directors annually.

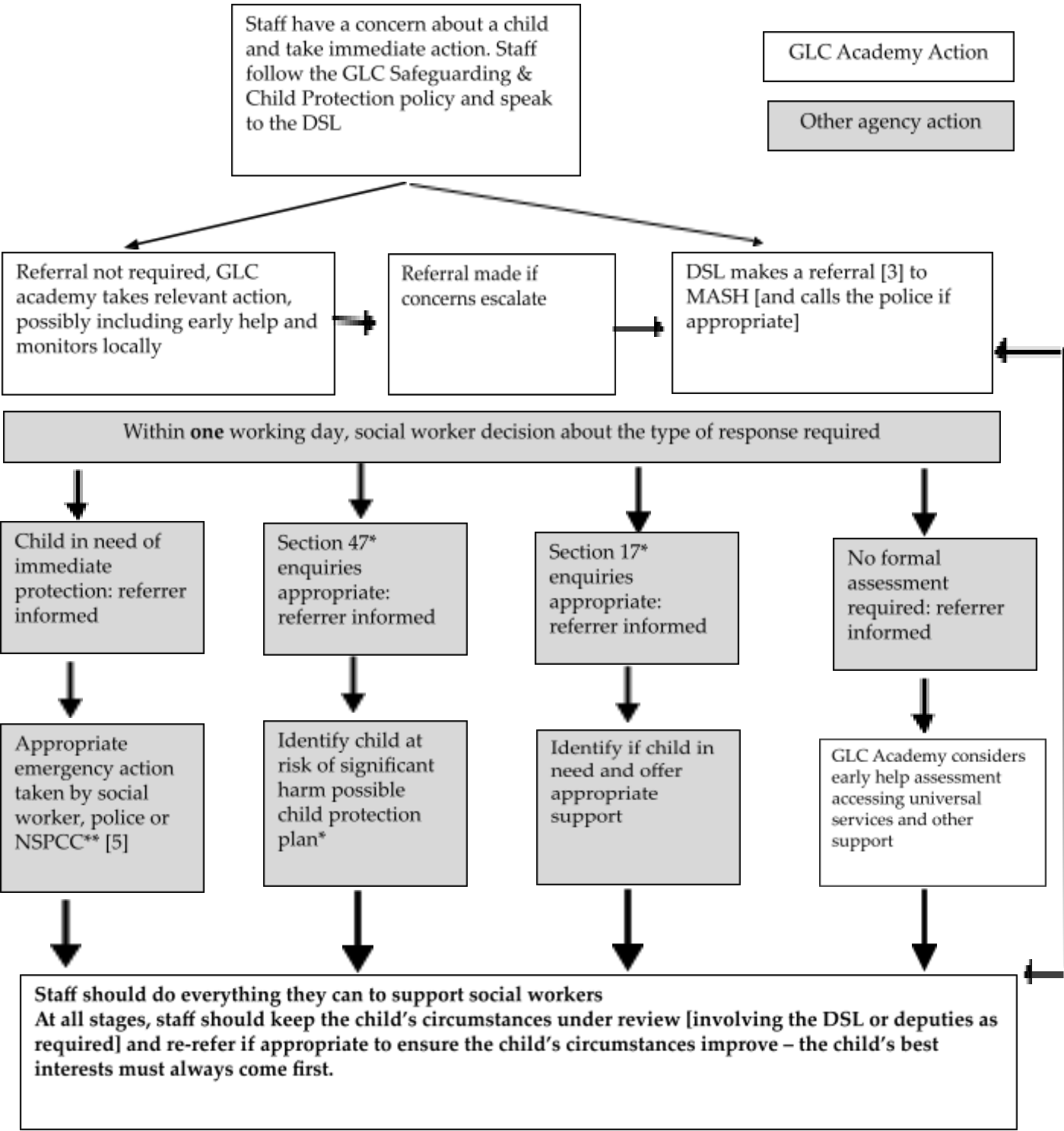
Appendix 1 [Safeguarding matrix]:

Academy record of safeguarding training

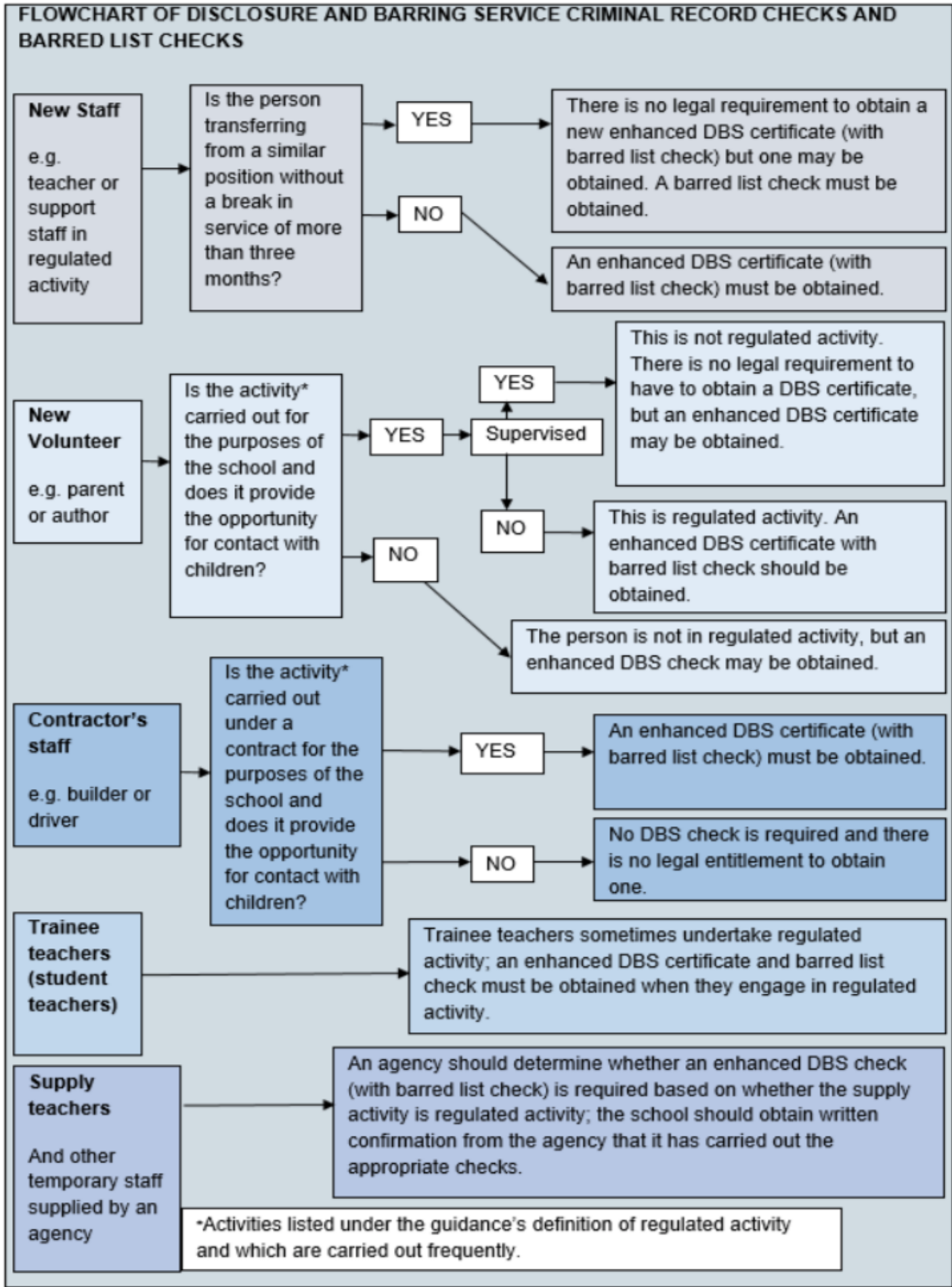
Staff Member	*Name here	*Name here	*Name here
Role			
Child Protection – Other related training [Level 2/3 - Please specify]			
Safer Recruitment Training			
Positive Handling			
CPOMS			
Fire Safety			
Fire Marshall Training			
Prevent			
First Aid (FAW & Paediatric)			
Anti Bullying			
Keeping Children Safe in Education document			
Food & Hygiene			
Minibus training			

Appendix 2

Actions where there are concerns about a child



Appendix 3





Appendix 4

SET MULTI-AGENCY PROTOCOL

<https://www.thurrocklscp.org.uk/lscp/professionals/set-procedureS>

Appendix 5: Specific safeguarding issues

This appendix is mostly based on the advice in Keeping Children Safe in Education. This also includes information on further issues to be aware of, including child abduction and community safety incidents, children's involvement in the court system, children with family members in prison, county lines, modern slavery and cybercrime.

Assessing adult-involved nude and semi-nude sharing incidents

This section is based on The UK Council of Internet Safety's advice for education settings.

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person;
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images;
- Moved from a public to a private/E2EE platform;
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes;
- Offered something of value such as money or gaming credits;
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them;
- Use images that have been stolen from the child or young person taken through hacking their account;
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person;
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first;
- Moved from a public to a private/E2EE platform;
- Pressured into taking nudes or semi-nudes;
- Told they have been hacked and they have access to their images, personal information and contacts;
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person.

Children who are absent from education

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect;
- Are at risk of forced marriage or FGM;
- Come from Gypsy, Roma, or Traveller families;
- Come from the families of service personnel;
- Go missing or run away from home or care;
- Are supervised by the youth justice system;
- Cease to attend a school;
- Come from new migrant families.

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

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

Child Criminal Exploitation

Child Criminal Exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions;
- Associating with other young people involved in exploitation;
- Suffering from changes in emotional wellbeing;
- Misusing drugs and alcohol;
- Going missing for periods of time or regularly coming home late;
- Regularly missing school or education;
- Not taking part in education.

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend;
- Suffering from sexually transmitted infections or becoming pregnant.

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

The GLC has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying);

- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse');
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos;
- 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;
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about The GLC's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the 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.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of Operation Encompass.

The DSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL [and deputy/deputies] will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

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

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 2 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place;
- A mother/family member disclosing that FGM has been carried out;
- A family/pupil already being known to social services in relation to other safeguarding issues;
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable;
 - Finding it hard to sit still for long periods of time (where this was not a problem previously);
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating;
 - Having frequent urinary, menstrual or stomach problems;
 - Avoiding physical exercise or missing PE;
 - Being repeatedly absent from school, or absent for a prolonged period;
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour;
 - Being reluctant to undergo any medical examinations;
 - Asking for help, but not being explicit about the problem;
 - Talking about pain or discomfort between her legs.

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider);
- FGM being known to be practised in the girl's community or country of origin;
- A parent or family member expressing concern that FGM may be carried out;
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues;

- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM;
 - Having limited level of integration within UK society;
 - Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”;
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period;
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM;
 - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion);
 - Being unexpectedly absent from school;
 - Having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication.

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 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.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the ‘1 chance’ rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place;
- Activate the local safeguarding procedures and refer the case to the local authority’s designated officer;
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmufco.gov.uk;
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

Preventing radicalisation

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence;
- **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
 - Negate or destroy the fundamental rights and freedoms of others; or
 - Undermine, overturn or replace the UK’s system of liberal parliamentary democracy and democratic rights; or
 - Intentionally create a permissive environment for others to achieve the results outlined in either of the above points.
- **Terrorism** is an action that:
 - Endangers or causes serious violence to a person/people;
 - Causes serious damage to property; or
 - Seriously interferes or disrupts an electronic system.

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our schools from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

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

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

Staff will be alert to changes in pupils' behaviour.

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

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

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

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

Further information on measures to prevent radicalisation are set out in other policies and procedures, including: curriculum policy, behaviour policy and our online safety policy.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex;
- Through a group of children sexually assaulting or sexually harassing a single child or group of children;
- Online and face to face (both physically and verbally).

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

In accordance with KCSIE 2026 and national VAWG strategies, the GLC recognises that child-on-child abuse exists on a continuum—from harmful sexual behaviour, misogynistic/misandrist culture, and discriminatory harassment to serious violence. Staff must challenge non-consensual behaviours, harmful banter, and misogyny early, treating all allegations with a safeguarding-first approach rather than dismissing them as normal developmental behaviour.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them;
- Regularly review decisions and actions, and update policies with lessons learnt;
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns;
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again;
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours;
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 2 of this policy. In particular, section 2.6 sets out more detail about The GLC's approach to this type of abuse.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school;
- Change in friendships or relationships with older individuals or groups;
- Significant decline in performance;
- Signs of self-harm or a significant change in wellbeing;
- Signs of assault or unexplained injuries;
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above)).

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male;
- Having been frequently absent or permanently excluded from school;
- Having experienced child maltreatment;

- Having been involved in offending, such as theft or robbery.

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

Checking the identity and suitability of visitors

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

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

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate).

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

Non-collection of children

If a child is not collected at the end of the session/day, we will:

Ensure that the class teacher/member of staff takes the child to the school office. A member of staff will contact parents to establish an estimated time of arrival. If the first contact does not answer, the school should make use of the other contact numbers. If there is still no contact from all other contacts and the time exceeds an appropriate time of waiting, a phone call will be made to MASH to establish the next steps.

The GLC have agreed that, with a signed confirmation/permission from parents/carers, children at a Primary age of Year 5 and 6, have permission to walk home by themselves.

Siblings who collect their younger siblings should be in Year 9 or above. Siblings in Year 8 and below do not have permission to collect children from Primary school.

Collection of Primary age children in Years 5 and 6 from events or trips after dark, must have an adult to collect and must not walk home by themselves. During lighter hours/summer time, from 6pm, adults must collect their children.

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

In the case of a pupil being unaccounted for, a leader will search the area while another member of staff remains in charge of other pupils.

In the unlikely event that a pupil cannot be found within 20 minutes, the leader will contact the police and parents/carers. They will ensure the Head of School is aware.

All incidents and accidents will be reported in line with our policies, including reporting on the serious incidents document. It will also be reported to social care or other agencies if appropriate.

Gender questioning children

Gender-Questioning Children: In line with KCSIE 2026 and national guidance, school responses to children questioning their gender must be child-centred, risk-based, and involve parents/carers [unless doing so poses a significant safeguarding risk to the child]. Schools will ensure appropriate provision regarding single-sex spaces [toilets, changing facilities, and accommodation on trips], providing single-occupancy alternative facilities where requested.