

Catch22 Independent School Policy

Safeguarding Policy *(including safe recruitment, allegations against staff and low level concerns)*

Include Primary Wales

Policy owner:	Head of Safeguarding
Accountable officer:	Andrew Preedy, Head teacher
Queries to:	Head of Safeguarding
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Catch22 group, entity, hub:	Catch22 Education
4Policies level (all staff or managers only)	All education staff

This policy will be reviewed annually.

Catch22 reserves the right to amend this policy, following consultation, where appropriate.

Catch22's approach to safeguarding all of our learners is founded in the nature of our relationships. We prioritise assessing and managing the needs of our learners and have a dynamic approach to identification, assessment and response to risk.

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Catch 22 Independent Schools

Education Intent Statement

Catch22's Vision:

To deliver better social outcomes through transforming public service through the 3Ps:

Place

Supporting people to find, retain, transition safely into homes and communities

Purpose

Working with people to achieve their purpose in education, employment or training

People

Building networks of people around individuals

Our Education Mission:

To enable young people to progress and succeed in sustained education, training or employment.

We do this through engaging young **people** positively with their **purpose** through learning and future life aspirations. All our learners achieve positive outcomes, thrive and enjoy a quality education that is delivered by skilled, passionate **people** with high expectations in a **place** that is safe, high quality and appropriate.

Our schools cater for young people aged 4-16 who are outside of mainstream education, many of whom have troubled and challenging backgrounds. We embody our vision in all we do to ensure our young people are supported fully to achieve these goals.

Our Educational Intent:

	Evidenced in this policy?
Brilliant basics, magic moments • Support pupils to gain academic qualifications, experiences and the skills needed to move successfully to the next stage in life. • Provide a values-based curriculum, working with pupils to build their spiritual, moral, social and cultural capital and personal development Relationships beat structures	√

• Treat pupils as individuals and help them to build bright futures in both their personal and professional lives	✓
Things about you, built with you, are for you • Understand pupils' unique needs and help them overcome their barriers to learning • Engage young people with a broad and rich curriculum so they can realise their ambitions • Make our pupils' voices heard and harness participation to benefit pupils and help our schools to improve.	✓
Unleash Greatness • Have high aspirations for our pupils so they leave us prepared for life in modern Britain and the wider world. • Instill belief in pupils so they can progress and succeed in education, training and employment	✓
Let robots be robots and humans be human • Ensure pupils have a rounded understanding of themselves and the world around them. • Harness curiosity and nurture a love of learning. • Support and protect our pupils to be safe and feel safe online and offline.	✓
Incubate, accelerate, amplify Embrace the values of 'Rights Respecting Schools'; helping pupils thrive as individuals both as members of their school and the wider community.	✓ Article 29- <i>(goals of education)</i> <i>Education must develop every child's personality, talents and abilities to the full.</i>

Important contacts

Head of Safeguarding	Graham Vagg Graham.vagg@catch-22.org.uk
Headteacher	Andrew Preedy Andrew.preedy@catch-22.org.uk 07540677632
Proprietor Independent Schools	Gemma Wall Gemma.wall@catch-22.org.uk
Designated Safeguarding Person (DSP)	Andrew Preedy Andrew.Preedy@catch-22.org.uk 07540677632
Deputy DSP	Karl Johansson Karl.johansson@catch-22.org.uk
Deputy DSP	Samantha Hawkins Samantha.hawkins@catch-22.org.uk
Multi Agency Safeguarding Hub (MASH)	Blaenau Gwent Tel: 01495 315700 Email: DutyTeam@blaenau-gwent.gov.uk Caerphilly Tel: 0808 100 1727 Email: contactandreferral@caerphilly.gov.uk Monmouthshire Tel: 01291 635 669 Email: ChildDuty@monmouthshire.gov.uk

	Newport Tel: 01633 656656 Email: children.duty@newport.gov.uk Torfaen Tel: 01495 762200 Email: socialcarecalltorfaen@torfaen.gov.uk After 5pm, weekends and bank holidays call South East Wales emergency duty team 0800 328 4432.
Local Authority Designated Officer (LADO)	Mike Portlock (Newport) 01633 656656
Local Safeguarding board	https://www.gwentsafeguarding.org.uk/en/Children/Safeguarding-Children.aspx
National Police Prevent Advice Line	0800 011 3764
Local Prevent Training/Queries	Daniel.Harvey@Newport.gov.uk

1. Aims

The school aims to ensure that:

Appropriate action is taken in a timely manner to safeguard and promote children's

welfare All staff are aware of their statutory responsibilities with respect to

safeguarding

Staff are properly trained in recognising and reporting safeguarding issues

2. Legislation and statutory guidance

Catch22 Include School Wales's approach to safeguarding is based on the statutory guidance

- [Education Act 2002](#)
- [Keeping Learners Safe](#)
- [Social Services and Well-being \(Wales\) Act 2014](#)
- [Wales Safeguarding Procedures](#)
- [Working Together to Safeguard People: Code of Safeguarding Practice](#)
- [Additional Learning Needs and Education Tribunal \(Wales\) Act 2018](#)
- [Additional Learning Needs Code for Wales 2021](#)
- [Equality Act 2010](#)
- [Human Rights Act 1998](#)
- [Safeguarding Vulnerable Groups Act 2006](#)
- [Counter-Terrorism and Security Act 2015](#)
- [Domestic Abuse Act 2021](#)
- [Violence against Women, Domestic Abuse and Sexual Violence \(Wales\) Act 2015](#)
- [Online Safety Act 2023](#)
- [Sexual Offences Act 2003](#)
- [Female Genital Mutilation Act 2003](#)
- [Data Protection Act 2018 / UK GDPR](#)
- [Child Minding and Day Care \(Disqualification\) \(No.2\) \(Wales\) Regulations 2022](#)
- relevant Welsh safeguarding guidance.

This policy also complies with our admissions policy and charitable aims.

3. Definitions

Safeguarding and promoting the welfare of children means:

Protecting children from maltreatment

Preventing impairment of children's mental and physical health or development

Ensuring that children grow up in circumstances consistent with the provision of safe and effective care

Taking action to enable all children to have the best outcomes

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

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.

Sexting (also known as youth produced sexual imagery) is the sharing of sexual imagery

(photos or videos) by children

Children includes everyone under the age of 18.

4. Equality statement

The school adopts a rights-based approach under the UNCRC and the Children's Rights (Wales) Measure 2011. Safeguarding decisions will place the best interests of the child at the centre and ensure learners are heard and involved in decisions affecting them.

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

Have special educational needs (SEN) or disabilities (**see section 11**)

Are young carers

May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality Have English as an additional language

Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence

Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation Are asylum seekers

Are at risk due to either their own or a family member's mental health needs Are looked after or previously looked after (see section 13)

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and proprietors of the school and is consistent with the procedures of the local safeguarding board. Our policy and procedures also apply to extended school and off-site activities.

5.1 All staff

All staff will be aware of:

Our systems which support safeguarding, including this child protection and safeguarding policy;

- the staff code of conduct
- the role and identity of the designated safeguarding person (DSP) and deputies,
- low level concerns policy
- the behaviour policy,
- The safeguarding response to children who go missing from education

The early help process and their role in it, including identifying emerging problems, liaising with the DSP, and sharing information with other professionals to support early identification and assessment

The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play

What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals

The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalization

Staff should understand:

- professional curiosity
- information sharing
- contextual safeguarding
- exploitation
- child-on-child abuse
- harmful sexual behaviour
- online harms
- misogyny/VAWG
- ALN-related safeguarding barriers.

Appendix 3 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding person (DSP)

The DSP will ensure compliance with Keeping Learners Safe and Wales Safeguarding Procedures, participate in multi-agency safeguarding arrangements, monitor attendance and wellbeing indicators, oversee contextual safeguarding assessments and promote trauma-informed practice.

Our DSP is Andrew Preedy. The DSP takes lead responsibility for child protection and wider safeguarding.

Andrew Preedy
Andrew.preedy@catch-22.org.uk 07540677632

During term time, the DSP will be available during school hours for staff to discuss any safeguarding. When the DSP is absent, the deputies will act as cover.

Karl Johansson
Karl.johansson@catch-22.org.uk

Samantha Hawkins
Samantha.hawkins@catch-22.org.uk

If the DSP and deputy are not available, Head of Safeguarding will act as cover (for example, during out-of-hours/out-of-term activities).

The DSP will be given the time, funding, training, resources and support to:

Provide advice and support to other staff on child welfare and child protection matters

Take part in strategy discussions and inter-agency meetings and/or support other staff

to do so Contribute to the assessment of children

Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

The DSP will also keep the headteacher informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

The full responsibilities of the DSP and deputies are set out in their job description.

5.3 Governance

The Proprietor will receive regular safeguarding assurance reports covering referrals, attendance trends, recruitment compliance, training compliance, learner wellbeing and outcomes of safeguarding audits.

The Catch22 Safeguarding Board has responsibility for oversight and management of this policy.

Catch22's strong focus on governance means that all matters relating to safeguarding are overseen by the Safeguarding Board, which is comprised of designated Safeguarding Leads from each business area.

Alongside reviewing and monitoring safeguarding incidents through our safeguarding performance framework and organisational lessons learnt, the Safeguarding Board is the formal mechanism by which Catch22 disseminates safeguarding roles and responsibilities to staff as well as setting the strategic direction for safeguarding within its services. This group ensures effective communication between the managers and corporate departments and acts as the leadership group on safeguarding issues by:

- providing up to date knowledge on safeguarding matters
- ensuring that staff have access to appropriate safeguarding training
- reviewing how the safeguarding policies are working in practice.

5.4 An overview of organisational safeguarding structure

The Chief Executive of Catch22 holds ultimate accountability for ensuring safeguarding arrangements, as delegated to this role by the **Board of Trustees**. As a registered charity, Catch22 has a **Safeguarding Trustee** on the Board of Trustees.

The Catch22 Independent Schools proprietor is Catch22. The proprietor has legal responsibilities for safeguarding in all the schools across the Catch22 Charity. These responsibilities include;

- The school has suitable child protection policies and procedures in place, which are made available to parents and on the school website.
- The school operates safer recruitment procedures and makes sure all appropriate checks are carried out on those working with children.

- The school has suitable procedures for dealing with allegations of abuse.
- All staff who work in the schools have regular safeguarding training.
- Any deficiencies or weaknesses to child protection arrangement are remedied without delay.
- Safeguarding policy and other related policies are reviewed annually.

This Safeguarding policy covers how the proprietor meets their legal responsibilities.

Catch22 has an organisational Head of Safeguarding, who is an experienced and qualified safeguarding practitioner to ensure that safeguarding matters are central to the strategic management of Catch22.

5.5 The Head teacher

The Head teacher is responsible for the implementation of this policy, including:

Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction

Communicating this policy to parents when their child joins the school and via the school website

Ensuring that the DSP has appropriate time, funding, training and resources, and that there is always adequate cover if the DSP is absent

Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly

Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see managing allegations policy).

Ensuring the relevant staffing ratios are met, where applicable

6. Confidentiality

The school will:

- Ensure confidentiality protocols are adhered to and information is shared appropriately. If in any doubt about confidentiality, staff will seek advice from a senior manager or Social Care Worker as required.
- The school follows the 'Information sharing':
<https://www.gov.wales/sharing-information-safeguard-people-factsheet>
- Lead will only disclose any information about a pupil to other members of staff on a 'need to know' basis, including Domestic Violence notifications
- Make all staff aware that they have a professional responsibility to share information with other agencies in order to safeguard young people
- Ensure staff are clear with young people that they cannot promise to keep secrets.
- Timely information sharing is essential to effective safeguarding
- Information must be shared on a 'need-to-know' basis, but you do not need consent to share information if a child is suffering, or at risk of, serious harm
- Confidentiality is also addressed in this policy with respect to record-keeping in section 20, and a separate allegations of abuse against staff policy

Further information on data protection can be found in Data Management and Protection policy.

7. Recognising abuse and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSP to mean "the DSP (or deputy DSP)".

7.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.**

Tell the DSP (see section 5.2) as soon as possible if you make a referral directly. Referrals will be made in line with Gwent Safeguarding board procedures;

7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should (NSPCC what to say to a child and how to respond):

- **Listen carefully to what they are saying.** Be patient and focus on what you are being told. Try not to express your own views and feelings. Allow them time to talk freely and do not ask leading questions.

Stay calm and do not show that you are shocked or upset.

- If you appear shocked or as you do not believe them it could make them stop talking and take back what they have said.

- **Tell them it is not their fault and they have done the right thing telling you.** Abuse is never a child's fault. It is important they hear, and know this.
- **Explain what will happen next and that you will have to pass this information on.**
Do not promise to keep it a secret
- **If you consider the child to be at immediate risk of harm tell the DSP or deputy DSP straight away.**
- **Write up your conversation as soon as possible on cpoms in the child's own words.** Stick to the facts, and do not put your own judgement on it. Alert the DSP and deputy DSP's once entered on cpoms.
- **Alternatively, if appropriate, make a referral to children's social care and/or the police directly** (see 7.1), and tell the DSP as soon as possible that you have done so

7.3 If you discover that FGM has taken place or a pupil is at risk of FGM

Keeping Learners Safe explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4.

Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSP and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSP and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSP and report their concerns using CPOMS.

7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 on page 12 illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSP first to agree a course of action.

If in exceptional circumstances the DSP is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSP as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSP as soon as possible.

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSP will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSP as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSP or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSP or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

Details on how to make a referral to can be found here;

<https://www.gwentsafeguarding.org.uk/en/Children/Report/Report-a-child-at-risk.aspx>

7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSP first to agree a course of action.

If in exceptional circumstances the DSP is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSP or deputy as soon as practically possible after the referral.

Where there is a concern, the DSP will consider the level of risk and decide which agency to make a referral to.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if

you: Think someone is in immediate danger

Think someone may be planning to travel to join an extremist

group See or hear something that may be terrorist-related

7.6 If you have a mental health concern

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSP to agree a course of action.

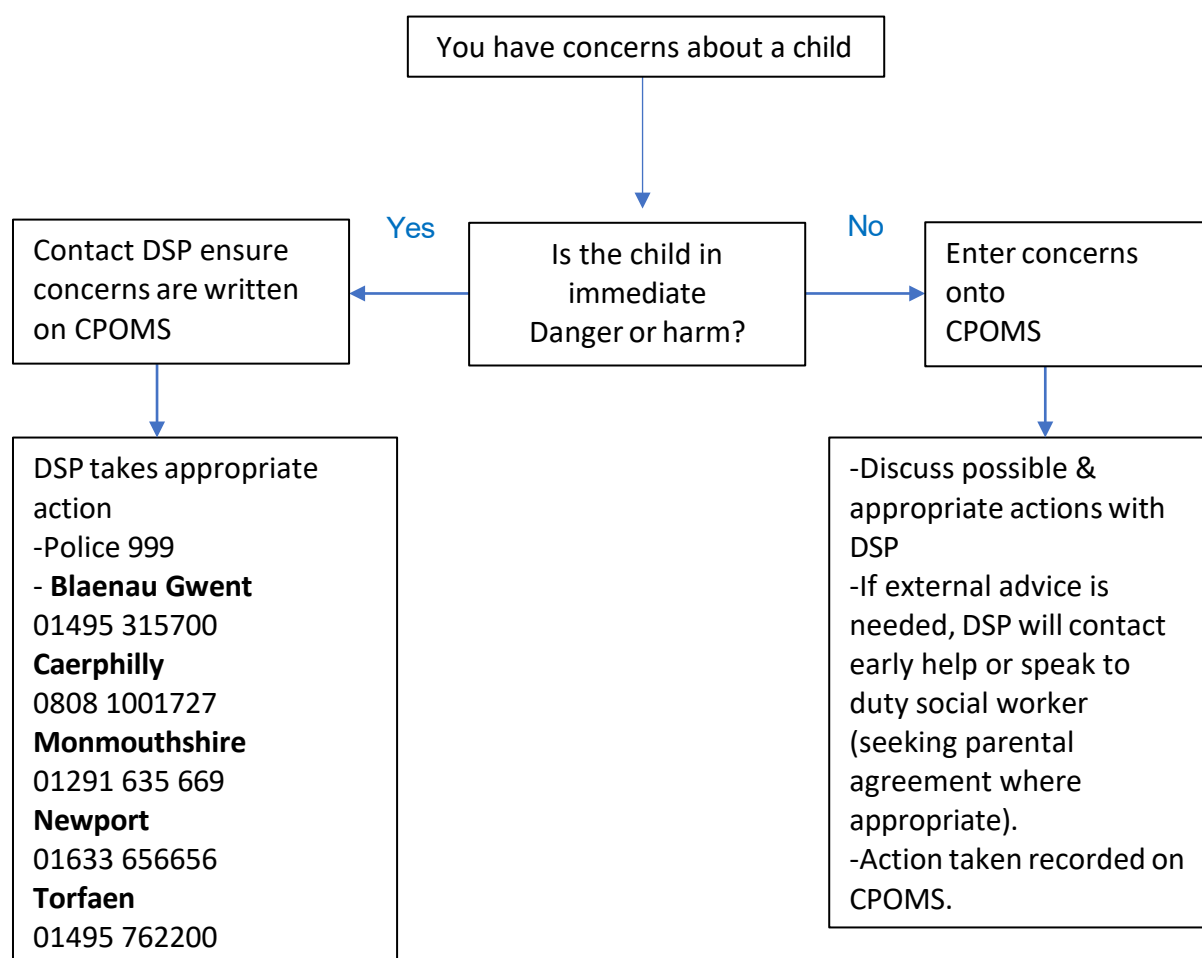
The school is able to sign post pupils to counselling services;

<https://www.includewales.org.uk/school-and-community-based-counselling/>

The school will use Motional as assessment for early intervention to support pupils with their social, emotional needs. If it is felt the pupil needs more targeted intervention an I Scan referral will be completed.

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



7.7 Concerns about a staff member, supply teacher or volunteer

If you have concerns about a member of staff or volunteer, speak to the head teacher. If you have concerns about the head teacher, speak to proprietor of the Independent schools.

The head teacher/ proprietor will then follow the procedures set out in Managing allegations against staff policy or low level concern policy, if appropriate.

Any concern regarding a member of staff will be escalated to the Catch22 Head of Safeguarding.

7.8 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 3 for more information about child-on-child abuse.

Procedures for dealing with allegations of child-on-child abuse

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation and tell the DSP, but do not investigate it
- The DSP will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSP will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSP will contact the children and adolescent mental health services (CAMHS), if appropriate

Creating a supportive environment in school and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images. Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys

Ensure our curriculum helps to educate pupils about appropriate behaviour and consent

Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 8 below)

Ensure staff reassure victims that they are being taken

seriously Ensure staff are trained to understand:

- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”

- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child's behaviour might indicate that something is wrong

That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation

That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it

That they should speak to the DSP if they have any concerns

7.9 Sharing of nudes and semi-nudes

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSP 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 DSP)

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 DSP'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 DSP.

Initial review meeting

Following a report of an incident, the DSP 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 DSP will make an immediate referral to police and/or children's social care if:

- The incident involves an adult
- 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 special educational needs)
- What the DSP 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 DSP 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 DSP, 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 DSP

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSP 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 DSP 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 dialing 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 and sex education. 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.

8. Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

Put systems in place for pupils to confidently report abuse

Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

Pupils can report concerns directly to school staff or they can report concerns through the school website, there is a link on the safeguarding page.

Pupils are reminded how to report concerns through posters around the school site

9. How pupils are taught about safeguarding

Pupils are taught about safeguarding through the following;

- Curriculum for Wales – Health and Well-being Area of Learning and Experience, including Relationships and Sexuality Education (RSE).
- Votes for schools

All pupils receive an induction and as part of the induction the DSP and Deputy DSP's are identified to them.

Pupils are taught how to keep themselves safe online and this is outlined in the E- Safety policy.

10. The Child's wishes

Where there is a safeguarding concern the DSP will ensure the child's wishes and feelings are taken into account when determining what action to take and services to provide. Following a disclosure the DSP will discuss with the child and give them an opportunity to express their views. The child will always be told of next steps following any disclosure. The DSP will always operate with the best interest of the child at their heart.

11. Notifying parents

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSP will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents about any such concerns following consultation with the DSP.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

12. Pupils with additional learning needs

We recognise that pupils with additional learning needs (ALN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration

Pupils being more prone to peer group isolation than other pupils

The potential for pupils with ALN being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs

Communication barriers and difficulties in overcoming these barriers

13. Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSP and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSP will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

14. Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements

The DSP has details of children's social workers and relevant virtual school heads

We have appointed a designated teacher, Hannah Sillman, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children.

15. Online safety and mobile phones

The school will educate learners about emerging risks including AI-generated content, deepfakes, sextortion, online coercion, misinformation, harmful online challenges and live-streaming risks.

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

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, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- **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; and
- **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 are a witness rather than a victim

Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year. We will throughout the academic year use the NOS (National Online Safety) training resources with staff.

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

Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present

- Staff will not take pictures or recordings of pupils on their personal phones or cameras

Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our E- safety policy.

16. Missing pupils/ Pupils absconding

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 follow pupil absconding procedures.

The local authority children's services team will be made aware there is an unexplained absence of a learner on the child protection register of more than two days' duration from school (or one day following a weekend).

17. Online Learning

If online learning has to continue or be reinstated at any point, Communication will only be through;

- School email
- Class DOJO
- Learning resources available online, included pre recorded sessions

The following will be adhered to;

- No personal contact information will be shared with parents and carers or students.
- Microsoft TEAMS (using the whiteboards app or Powerpoint presentations which can be shared through screen share, not just with the teacher's face) will be the only platform used for live taught learning sessions and apply to secondary schools only.
- A timetable will be published of when lessons will be taught.
- At the start of every live lesson students will be informed that the lesson is being recorded and their consent gained to continue participation in this session.
- Students will be reminded that they should also be in an appropriate place to take part in the lesson, not in their bedrooms and their clothing should be appropriate.
- Live lessons will be in groups only, there will be no 1:1 lessons.
- The background will need to be blurred and staff should be in professional dress.
- Lessons will be delivered on school site and supported by another staff member.

Further guidance for staff can be found here:

<https://www.catch-22.org.uk/news/guidance-on-delivering-and-accessing-remote-support/> <https://www.saferinternet.org.uk/advice-centre/teachers-and-school-staff>

18. Non-collection of children

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

Taxi – Phone company who are contracted to collect the pupil. If no answer, phone parent to collect. If parent is unable to collect, two members of staff (with business insurance) take the pupil home.

Parent – Phone call to parent, if no answer two members of staff take the pupil home – If no parent at home, return pupil to the school and call Social worker if the pupil has one if not call police.

Non collection can be very traumatic for a pupil, due to this it is important that the pupil is made to feel as safe and as comfortable as possible while still at school.

19. Emergency contacts

We ensure we have a minimum of 2 emergency contact numbers for each pupil. These emergency contacts are checked to ensure they are up to date every term. If a member of staff becomes aware an emergency contact number is no longer valid they inform the school admin.

20. Exclusions

If a pupil on the child protection register is excluded, either for a fixed term or permanently the school will notify childrens services.

21. Complaints and concerns about school safeguarding policies

21.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with Managing allegations against staff within the policy.

21.2 Other complaints

For further information read the Catch22 complaints policy.

21.3 Whistle-blowing

A separate Catch22 Whistle- blowing policy outlines the procedures for reporting a concern, how the school will respond and the protection available for staff who report another member of staff.

For further information read the Catch22 whistle- blowing policy. Other contacts you may use;

- NSPCC number 0800 800 5000
- I have a concern email ihave.aconcern@catch-22.org.uk

22. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing using CPOMS. If you are in any doubt about whether to record

something, discuss it with the DSP. Appendix 4 provides guidance on how to enter incidents onto CPOMS.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSP will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSP will speak to the DSP of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

The schools shares information with other agencies and when this is appropriate, in line with local safeguarding procedures.

Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks

23. 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 enhanced DBS check with barred list information has been carried out

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.

Further information can be found in Provider Access Policy.

24. Training

Safeguarding training will align with the Wales Safeguarding Training Standards Framework. Staff will complete Group A or Group B safeguarding training appropriate to their roles together with regular updates on Prevent, online safety, child-on-child abuse and trauma-informed practice.

24.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the school's

safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the safeguarding board. Every September safeguarding training will be delivered to all staff.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.

Staff will have access to National College to access further specific safeguarding training. Volunteers will receive appropriate training.

24.2 The DSP and deputies

The DSP and deputies will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSPs, or taking time to read and digest safeguarding developments). They will also undertake Prevent awareness training.

24.3 Proprietors

All proprietors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

As the proprietor may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

24.4 Recruitment – interview panels

At least one person conducting any interview for a post at the school will have undertaken safer recruitment training.

25. Monitoring arrangements

This policy will be reviewed **annually** by Catch22 Head of Safeguarding. At every review, it will be approved by proprietor Independent schools.

26. Links with other policies

Curriculum for Wales and Safeguarding

Trauma-Informed Practice and ACEs

Private Fostering

Contextual Safeguarding

Safeguarding assessments will consider risks arising from peer groups, community settings, transport routes and online environments.

Staff who become aware of a private fostering arrangement must inform the DSP immediately so that Children's Services can be notified in accordance with Welsh procedures.

The school adopts a trauma-informed approach recognising the impact of adverse childhood experiences on learning, behaviour, attendance and emotional wellbeing.

Safeguarding contributes directly to the Health and Well-being Area of Learning and

Experience and supports learners to develop knowledge, skills and behaviours to stay safe.

This policy links to the following policies and procedures:

Behaviour policy

Staff code of conduct

Complaints policy

Health and safety

policy Attendance

policy Online safety

policy Equality policy

Relationship and Sex Education policy

First aid policy

Curriculum policy

Designated teacher for looked-after and previously looked-after children

policy Privacy notices

Whistle Blowing policy

Disclosure and Barring Service (DBS) checks policy

Recruitment and selection policy

Data Management and Protection

policy Managing Allegations against

staff policy Provider Access Policy

Safeguarding Association Risk

policy Low- level concern policy

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

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.

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person

Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate

Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction

Seeing or hearing the ill-treatment of another

Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing

Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (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.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

Provide adequate food, clothing and shelter (including exclusion from home or abandonment) Protect a child from physical and emotional harm or danger

Ensure adequate supervision (including the use of inadequate care-givers) Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 2: safer recruitment, registration with EWC and DBS checks – policy and procedures

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

When appointing new staff, we will:

Verify their identity

Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months

Ensure they are registered on the DBS update service.

Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available

Verify their mental and physical fitness to carry out their work responsibilities

Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards

Verify their professional qualifications, as appropriate

Ensure they are not subject to a prohibition order if they are employed to be a teacher

Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent

Teaching staff will be registered with Education Workforce Council upon

appointment <https://www.ewc.wales/site/index.php/en/registration/applying-for-registration.html>

Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

Regulated activity means a person who will be:

Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or

Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or

Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

Existing staff are aware of the Catch22 Safeguarding Risk Association policy and their individual responsibilities in regards to this.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

We believe the individual has engaged in [relevant conduct](#); or

The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or

The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and

The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform, if these checks have not been completed we will not allow that individual to work in our academy. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

An enhanced DBS check with barred list information for contractors engaging in regulated activity

An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

For self-employed contractors such as music teachers or sports coaches, we will ensure

that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

We will:

Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity

Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity

Obtain references for the volunteer

Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Proprietors

All schools include:

Proprietors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

The Chief Executive Officer will have their DBS check countersigned by the secretary of state. All proprietors will also have the following checks:

A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)).

Identity

Right to work in the UK

Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform. We will also complete our own

quality assurance checks during the school year of their safeguarding practices.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Appendix 3: Specific safeguarding issues

This appendix is based on the advice in Keeping Learners Safe 2022. The school works in partnership with external agencies when it recognises a pupil is at risk and requires additional support to prevent any harm occurring.

Further information can be found on Gwent Safeguarding board;

<https://www.gwentsafeguarding.org.uk/en/Children/Professionals/Professionals.aspx>

Contextual safeguarding

Contextual safeguarding is an approach to practice and system design. It seeks to create a response

to extra familial forms of abuse that can:

- Target the contexts in which that abuse occurs, from assessment through to intervention
- Framework to address extra-familial risk through the lens of child welfare, as opposed to crime reduction or community safety
- Utilise partnerships between children's services and agencies who have a reach into extra- familial contexts (such as transport providers, retailers, youth workers, residents' associations, parks and recreation services, schools and so on), and;
- Measure success with reference to the nature of the context in which harm has been occurring, rather than solely focusing on any behaviour changes displayed by young people who were at risk in those contexts.

Further information can be found here <https://contextualsafeguarding.org.uk/>

Children missing from education

The school recognises persistent absence, repeated lateness and emotionally based school avoidance as potential safeguarding indicators requiring assessment of neglect, exploitation, abuse, mental health or family vulnerabilities.

A child going missing 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 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 go missing from education, particularly on repeat occasions, to help identify the risk of abuse 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 missing, 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, in 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 DSP. The DSP 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, in 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 CSE 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 DSP. The DSP will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

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 and child/adolescent to parent violence and abuse. 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.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

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.

The DSP 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 DSP 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 DSP will also make a referral to 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 DSP, who will activate local safeguarding procedures.

FGM

The DSP 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 7.3 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 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.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one 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 DSP 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 Live Fear Free on 0808 80 10 800 or e mail info@livefearfreehelpine.wales.

- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Extremism is "Extremism includes opposition to democratic principles, human rights, equality, mutual respect and the values promoted through Curriculum for Wales."

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 being drawn into terrorism. The DSP will undertake Prevent awareness training and 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 school being drawn into 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 an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

[Educate Against Hate](#) and [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 DSP.

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

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures.

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 and online.

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 peers

Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

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

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

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

Consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery)

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

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 our school's approach to this type of abuse.

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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

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 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school'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 DSP.

Appendix 4: Abuse of Trust

Welsh Assembly Government Guidance indicates that all Education staff need to know that inappropriate behaviour with, or towards, children is unacceptable. In particular, under the Sexual Offences Act, 2003, it is an offence for a person over 18 (for example teacher, youth worker) to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual. This applies where the child is in full-time education and the person works in the same establishment as the child, even if he/she does not teach the child.

In the Education Service, all relationships between staff and pupils are founded on trust. Broadly speaking, a relationship of trust can be described as one in which one party is in a position of trust or influence over the other, by virtue of their work or the nature of their activity. The individual in the position of trust may have the power to confer advancement or failure. The relationship may be distorted by fear or favour.

It is vital for all those in such positions of trust to understand the power it gives them over those they care for and the responsibility they must exercise as a consequence. While such a relationship of trust exists, allowing a relationship to develop in a way that might lead to a sexual relationship is wrong. A sexual relationship itself will be intrinsically unequal in a relationship of trust, and is therefore unacceptable. It is also inappropriate since the 'professional' relationship of trust would be altered.

The Sexual Offences (Amendment) Act, 2000, set out a series of occupations to which the Abuse of Position of Trust laws apply. This includes anyone working in an educational institution.

The primary purpose of the Abuse of Trust provisions is to provide protection for young people aged 16 and 17, who are considered particularly vulnerable to exploitation by those who hold a position of trust or authority in their lives. Subject to a number of limited definitions, it is a criminal offence for a person, in a position of trust, to engage in any sexual activity with a person aged under 18 with whom they have a relationship of trust, irrespective of the age of consent even if the basis of their relationship is consensual.

A relationship exists where a member of staff or volunteer is in a position of power or influence over young people aged 16 or 17 by virtue of the work or nature of the activity

being undertaken.

The principles apply irrespective of sexual orientation: neither homosexual nor heterosexual relationships are acceptable within a position of trust. They apply equally to all, without regard to gender, race, religion, sexual orientation or disability. This is an area where it is very important to avoid any sexual or other stereotyping. In addition, it is important to recognise that women as well as men may abuse a position of trust.

All staff should ensure that their relationships with young people are appropriate to their age and gender, and take care that their language and conduct does not give rise to comment or speculation. Attitudes, demeanour and language all require care and thought, particularly when members of staff are dealing with adolescent boys and girls.

Appendix 5: allegations of abuse made against staff

Allegations against staff (including low-level concerns) policy

Section 1: allegations that may meet the harm threshold

This section is based on Keeping Learners Safe and the Wales Safeguarding Procedures, the Catch-22 Managing Allegations policy and Low Level Concerns Policy.

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or :

- Possibly committed a criminal offence against or related to a child, and/or:

- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or :

- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school.

If we're in any doubt as to whether a concern meets the harm threshold, we will consult Catch22 Head of Safeguarding who will decide if further advice is needed from our local authority designated officer (LADO). We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgement.

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

We will take all possible steps to safeguard our children and to ensure that the adults in our school are safe to work with children. When concerns arise, we will always ensure that the procedures outlined in the local protocol and [Wales Safeguarding Procedures](#) are adhered to and will seek appropriate advice. The first point of contact for schools regarding concerns and/ or allegation issues (including for supply teachers) is Catch22 Head of Safeguarding.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work within Catch-22

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation

False: there is sufficient evidence to disprove the allegation

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below. Hold an initial conversation with the relevant people partner and the Head of Safeguarding of Catch 22

Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)

Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies

Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as

those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate

Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSP and make a risk assessment of the situation. If necessary, the DSP may make a referral to children's social care

If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details

If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate

Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. All Catch22 staff have been provided with 24 hour Health Assured cover.

Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)

Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the

- facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavor to comply with the following timescales, where reasonably practicable:

Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week

If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days

If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavor to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps.

If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified

The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual. For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

This section is based on [Safeguarding Allegations/Concerns about practitioners and those in positions of trust from Wales Safeguarding Procedures](#).

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff

Disclosure made by a child, parent or other adult within or outside the school Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work,

and

Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- Being overly friendly with children : Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others

Empowering staff to share any low-level concerns as per section 7.7 of this policy : Empowering staff to self-refer

Addressing unprofessional behaviour and supporting the individual to correct it at an early stage

Providing a responsive, sensitive and proportionate handling of such concerns when they are raised

Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously : To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's Catch-22 staff code of conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSP.

Keeping Learners Safe also links to this report for more information [Developing and implementing a low-level concerns policy: A guide for organisations which work with children](#)

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Appendix 6 CPOMS User Guide

If the pupil is at immediate harm, please inform the DSP. If the DSP is not on site inform the Deputy DSP.

CPOMS is our means of reporting any safeguarding concerns. It is vital that everyone follows the same procedures when using this system. Listed below are instructions for you so that you know what to do each time.

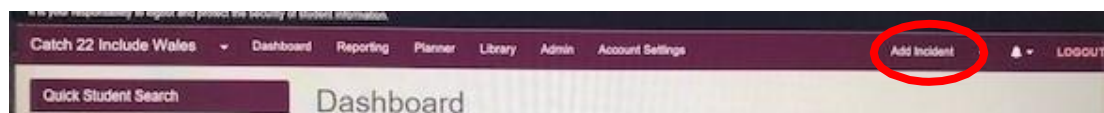
Please add the link to the main log in page <https://includewales.cpoms.net> to your favourites for ease of access.

Logging In:

Go to the main log in page (link above) and enter your email address and password.

Adding an Incident

Click on add incident.



Start typing the student's name in the 'Student' box. Then type in the details of the incident or concern in the box below. Please record facts, not opinions*. You might find using the following questions as prompts helpful.

- WHAT HAPPENED?
- WHERE DID IT HAPPEN?
- WHEN DID IT HAPPEN?
- WHO WAS PRESENT WHEN IT HAPPENED?
- HAS IT HAPPENED BEFORE?
- WHAT HAPPENED AFTERWARDS?
- WHAT HAPPENED BEFOREHAND?
- HAVE YOU TOLD ANYONE ELSE?

*IT IS OK TO STATE WHY YOU ARE CONCERNED BY THIS IN YOUR PROFESSIONAL OPINION

After the incident has been typed please select the category that you think is most relevant. You can select more than one.

Please ensure the date and time is accurate and represents when you were first made

You may need to upload a file as part of the record. For example where a student may have written something that causes concern in a book and a photo is taken,

When you have completed all of the above click 'Add Incident'. Please ensure that you check over the report for any mistakes or inaccuracies as it cannot be deleted once saved.

Then type in names of staff to alert them to this incident.

Linked Student(s)

Type a student's name to link them to this incident.

Date/Time

Mon 25 Jan 2016

14:10

Alert Staff Members

Exec. Headteacher

SLT

Type a colleague's name or select a user group to alert them to this incident. Colleagues highlighted in red would not normally be able to view this incident.

Who should I alert?

File(s)

Browse...

Agency Involved

Select Agencies

Add Incident

CPOMS is completely secure – you may use full names when making reports. You can also access CPOMS from any internet connection (still secure).

Annex 1: Equality Impact Assessment

1. Summary

This EIA is for:	Safeguarding Policy, Wales Include
EIA completed by:	Head of Safeguarding
Date of assessment:	06/09/2026
Assessment approved by:	Education SLT

Catch22 is committed to always: avoiding the potential for unlawful discrimination, harassment and victimisation; advancing equality of opportunity between people who share a protected characteristic and those who do not; and, foster good relations between people who share a protected characteristic and those who do not.

An Equality Impact Assessment (EIA) is a tool for identifying whether or not strategies, projects, services, guidance, practices or policies have an adverse or positive impact on a particular group of people or equality group. Whilst currently only public bodies are legally required to complete EIA's under the Equality Act 2010, Catch22 has adopted the process in line with its commitment to continually improve our equality performance.

Policy owners are required to complete or review the assessment indicating whether the policy has a positive, neutral or negative impact for people who it applies to and who share one or more of the 9 protected characteristics under the Equality Act 2010.

Definitions are based on the Equality & Human Rights (EHRC) guidance.

Objectives and intended outcomes

This EIA has been completed in order to ensure that the implications and potential impact, positive and negative, of this policy have been fully considered and addressed, whether or not people share a protected characteristic.

2. Potential Impacts, positive and negative

Equality Area	Positive	Neutral	Negative	Please give details including any mitigation for negative impacts
Age Does this policy impact on any particular age groups or people of a certain age?	☐	☒	☐	
Disability Does this policy impact on people who have a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day to day activities?	☐	☒	☐	
Gender reassignment (transsexual, transgender, trans) Does this policy impact on people who are transitioning from one gender to another (at any stage)	☐	☒	☐	
Marriage and civil partnership Does this policy impact on people who are legally married or in a civil partnership?	☐	☒	☐	

Pregnancy and maternity (in work this is linked to maternity leave, non- work this is for 26 weeks after giving birth) Does this policy impact on people who are pregnant or in their maternity period following the birth of their child?	☐	☒	☐	
Race Does this policy impact on people as defined by their race, colour and nationality (including citizenship) ethnic or national origins	☐	☒	☐	
Religion and belief Does this policy impact on people who practice a particular religion or none, or who hold particular religious or philosophical belief or none?	☐	☒	☐	
Sex Does this policy impact on people because they are male or female?	☐	☒	☐	
Sexual orientation Does this policy impact on people who are sexually attracted towards their own sex, the opposite sex or to both sexes?	☐	☒	☐	

3. More information/notes