



## Safeguarding & Child Protection Policy and Procedures

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Gateways School  
Independent Day School for Boys and Girls

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## Policy Aims

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

- 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.

Every child has a right to a secure and valued childhood. Their needs are paramount and so a child-centred approach is taken to provide a safe environment in which children can learn.

We endeavour to provide each pupil with a safe environment where no-one should feel vulnerable. Our knowledge of individual pupils is such that we aim to be sensitive to any changes of behaviour which may indicate a child is at risk.

Gateways always aims to safeguard and promote the welfare of its pupils, acting in the best interests of the child.

Gateways recognises its legal and professional duty to work with other agencies in protecting children from harm and responding to abuse forms. We are part of a wider safeguarding system as described in Working Together to Safeguard Children.

This policy and its procedures aim to:

- contribute to the prevention of abuse experiences and protection of our pupils;
- be aware of child abuse, which consists of anything which individuals, institutions, or processes, do or fail to do, which directly or indirectly harms children, or damages their prospects of a safe and healthy development into adulthood;
- ensure the school works in partnership with parents and other agencies as appropriate;
- include issues of personal safety in the curriculum;
- ensure pupils' safety in the workplace setting and on visits;
- ensure all staff are alert to signs of abuse, including self-harm;
- ensure the Designated Safeguarding Leads (DSLs) and the Deputy Designated Safeguarding Lead update their training in safeguarding and child protection every two years and in addition refresh their knowledge at regular intervals, at least annually;
- involve all staff and volunteers, including the Head and the Safeguarding Governor in child protection training every three years and in addition ensure that they receive updates, at least annually;
- Training for EYFS staff will be renewed every two years. Consideration will be given as to the need for individuals to undertake annual refresher training during any two year period to help maintain basic skills or as a result of any safeguarding concerns that occur.

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- operate safe recruitment procedures (including DBS checks and compliance with Independent School Standards Regulations) which include seeking assurance that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the school's pupils on another site;
- ensure that assurance is obtained that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the school's pupils on another site (refer to Recruitment Policy and Procedure);
- report, as required by Section 35 of the [Safeguarding Vulnerable Groups Act](#), to the Disclosure and Barring Service (DBS), immediately upon leaving the school any person (whether employed, contracted, a volunteer or a student) whose services are no longer used because he/she is considered unsuitable to work with children;
- forward child protection records onto the named designated child protection person at the next education establishment;
- report any pupil who leaves the school roll, and whose new school is not known, to the Attendance Strategy Team at the Local Authority Children's Service Education Department in accordance with Gateways 'Children Missing Education' procedures;
- ensure any deficiencies or weaknesses in safeguarding child protection arrangements are remedied without delay;
- include arrangements to deal with allegations of abuse against members of staff/volunteers/the Head (refer to 'Allegations Against Staff' section);
- know that confidentiality cannot be promised to a pupil giving evidence and they must always act in the best interests of the child and, wherever possible, according to their wishes;
- implement safeguarding procedures which address signs of possible abuse and the school's reporting arrangements;
- guide staff to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil in accordance with Gateways Staff Code of Conduct and Practice;
- where EYFS is concerned, notify ISI of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere);
- inform staff that safeguarding is everyone's responsibility, and anyone can make a referral, if necessary.

## Legislation and guidance

Gateways operate safeguarding procedures in line with the Leeds Safeguarding Children Partnership and will fulfil local and national responsibilities as laid out in the following legislation and guidance:

- [Keeping Children Safe in Education \(KCSIE\) 2025](#)

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- [Working Together to Safeguard Children 2023](#)
- [Guidance for safer working practice for those working with children and young people in education settings \(GSWP\) \(Safer Recruitment Consortium Feb 2022\)](#)
- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.
- [Information Sharing Advice for practitioners providing safeguarding services for children, young people, parents and carers – May 2024](#)
- [What to do if you are worried a child is being abused - Advice for practitioners 2015](#)
- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils.
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person on a school interview/appointment panel to be trained in safer recruitment techniques.
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children.
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children.
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children.
- [Education Act 2002](#)
- [Children missing education – Statutory guidance for local authorities 2024](#)
- Statutory [Guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
- [Sharing nudes and semi-nudes: how to respond to an incident \(overview\) \(updated March 2024\) - GOV.UK \(www.gov.uk\)](#)
- [When to call the police – Guidance for schools and colleges \(NPCC – 2020\)](#)
- [Education and Training \(Welfare of Children\) Act 2021](#)
- [Use of social media for on-line radicalisation July 2015](#)
- [Female Genital Mutilation Act 2003 \(Serious Crime Act 2015, Section 74\)](#)
- [Statutory Guidance on FGM](#)
- [Data Protection Act 2018](#)
- [Education \(Pupil Information\) \(England\) Regulations 2005](#)
- [Teacher misconduct: the prohibition of teachers 2022](#)
- The [Childcare \(Disqualification\) Regulations 2018](#) and [Childcare Act 2006](#), which set out who is disqualified from working with children.
- [Statutory framework for the Early Years Foundation Stage 2024](#)
- [Safeguarding Vulnerable Groups Act 2006](#)
- [Use of reasonable force Advice for head teachers, staff and governing bodies 2013](#)

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- [Sexting in schools and colleges March 2024](#)
- [The designated teacher for looked after and previously looked-after children Statutory guidance on their roles and responsibilities February 2018](#)
- [Preventing and tackling bullying advice 2017](#)
- [Mental health and behaviour in schools 2018](#)
- [Promoting children and young people's emotional health & wellbeing 2015 \(Updated Nov 2023\)](#)
- [Children Act 1989 Private Fostering](#)

## Scope and Application

This policy applies to children who have suffered, or are likely to suffer significant harm, or who are at risk of harm, as well as those who may be in need of additional support and early help from one or more agencies. For the purposes of this guidance children includes everyone under the age of 18.

This policy also meets requirements relating to safeguarding and welfare in the [Statutory framework for the Early years foundation stage for group and school based providers \(DfE 2024\)](#)

The following Gateways documents should also be referred to:

- Behaviour Policy and Procedures
- Anti-bullying Strategy
- Admissions Policy
- Recruitment Policy and Procedure
- Sex and Relationships Education Policy
- Whistleblowing Policy and Procedures
- Staff Code of Conduct and Practice
- Children Missing Education Procedures
- Online and eSafety Policy
- Electronic Communication and Internet Acceptable Use Policy
- Intimate Care Policy

This policy should also be read in conjunction with the school's E-Safety Policy, The Acceptable Use Policies for Staff, Students and Visitors which set out the acceptable use of ICT, including the use of 3/4G devices on school site.

This policy and its procedures are designed to address the specific statutory obligations on the School to safeguard the children at the school and to actively promote their welfare.

The policy and its procedures are subject to review for compliance, efficacy and implementation at Governor level annually. The Designated Safeguarding Leads will carry out these reviews. In addition, they will carry out any other updates, which may

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be necessary due to regulatory changes, or if guidance is received which requires reflection within the policy.

School staff build up considerable expertise in the area of safeguarding and dealing with concerns on a daily basis. They will be consulted when the Safeguarding & Child Protection Policy and Procedures is being reviewed to allow them to contribute to and shape safeguarding arrangements within the School.

Gateways is subject to regular inspection visits according to the inspection frameworks. Inspectors will always report on whether or not arrangements for safeguarding children are effective within the School. The school will be inspected by the Independent Schools Inspectorate (ISI); detail on the framework can be found here: [Independent Schools Inspectorate](#).

If any member of staff has any concerns about poor or unsafe practice and potential failure, they should immediately inform the Head or the Chair of Governors.

All staff should be familiar with the school's Safeguarding & Child Protection Policy and Procedures, including issues of confidentiality. Confidentiality is an important issue that needs to be understood by all those working with children, particularly in the context of safeguarding.

Gateways recognises that the only purpose of confidentiality in this respect is to benefit the child. Staff/volunteers and visitors to school should never promise a child that they will not tell anyone about an allegation/report of abuse and must pass any cause for concerns immediately to a designated safeguarding lead.

Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children. If staff are in any doubt about sharing information, they must speak to the designated staff, or the head teacher.

## Policy

Safeguarding and promoting the welfare of children is everyone's responsibility.

## Definitions

Safeguarding and promoting the welfare of children means:

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

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

Children includes everyone under the age of 18.

### Key Staff

- The Designated Safeguarding Leads (DSLs) are Dr Tracy Johnson and Mrs Helen Wallis who will take lead responsibility for the whole school including EYFS, and who are members of the Senior Leadership Team;
- The Deputy Designated Safeguarding Lead is Mr Ralph Widdop who will deputise for the leadership aspects of the DSLs role when they are unavailable;
- The Safeguarding Team consists of Dr Tracy Johnson, Mrs Helen Wallis, Mrs Carol Bartle, Mrs Diane White, Mr Ralph Widdop, Mrs Sarah Tiffany and Mr Matthew Hayes. All are trained to an equal standard and are able to act as Deputy DSLs in managing safeguarding concerns;
- The Head is Dr Tracy Johnson;
- The Safeguarding Governor with child protection responsibility is Miss Nicola Stephens.
- The Chair of Governors is Mr Nick MacHugh.

Contact details can be found in [Appendix A](#).

Should all members of the Safeguarding Team be unavailable due to illness, pandemic or any other emergency situation, then safeguarding matters, other than allegations against staff, should be referred to the most senior member of staff available who will liaise directly with the Leeds SCP. In the absence of the Head, allegations against staff should be referred directly to the Chair of Governors or Leeds SCP if the Chair is not available.

### Responsibilities

#### The designated safeguarding leads (DSLs) and deputy designated safeguarding lead (DDSL)

The DSLs take lead responsibility for child protection and wider safeguarding (including online safety and understanding the filtering and monitoring systems which are in place). Refer to DfE Guidance [Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK \(www.gov.uk\)](#)

Additionally, the DSLs, together with the Director of Digital Strategy should refer to [Plan Technology for Your School](#) which can be used to assess the provision against the filtering and monitoring standards.

The optimal scenario is to have a trained DSL or DDSL available on site. Where this is not possible (eg due to external commitments or training), a trained DSL or DDSL will

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be available to be contacted via phone or online video – for example when working from home.

During term time, a DSL will be available during school hours for staff to discuss any safeguarding concerns. Where a trained DSL (or Deputy) is not on site, in addition to the above, a senior leader will assume responsibility for co-ordinating safeguarding on site.

When the DSLs are absent, the Deputy DSL will act as cover.

If the DSLs and deputy are not available, The Deputy Heads of High School and Prep School will act as cover (for example, during out-of-hours/out-of-term activities).

The DSLs will be given the time, 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 by providing as much information as possible as part of the referral process to help social care assessments consider contexts outside the home and enable a contextual approach to harm
- Refer suspected cases, as appropriate, to the relevant body (children's social care Duty and Advice team, Channel programme, Disclosure and Barring Service, Teaching Regulation Agency and/or police), and support staff who make such referrals directly. Provide support for staff to comply with their mandatory reporting duties in cases where FGM has been identified.
- The DSLs will ensure that all staff involved in direct case work of vulnerable children, where there are child protection concerns/issues, have access to regular safeguarding supervision. (Ref: LCC Framework for Supervision (2021)).
- The DSLs will also keep the Head (if the Head is not one of the DSLs) informed of any issues and liaise with local authority officers and relevant professionals for child protection concerns as appropriate.
- The DSLs are responsible for responding to domestic abuse notifications from the local authority and providing support to children and their families as appropriate.
- The school will ensure representation at appropriate inter-agency meetings such as Initial and Review Child Protection Conferences, and Planning and Core Group meetings, as well as Family Support Meetings.
- Provide reports as required for meetings. Reports will, wherever possible, be shared with parents/carers at least 24 hours prior to the meeting.
- Where a child in school is subject to an inter-agency child protection plan or any multi-agency risk management plan, the DSLs will contribute to the preparation, implementation, and review of the plan as appropriate.

- The designated safeguarding leads and any deputies should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children (2023). When to call the police (NPCC 2020) should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.
- Promote the educational outcomes of children with a social worker and other pupils deemed vulnerable. It is essential therefore that the DSLs work in close collaboration with the DT and SENDCO as children who are in need of help and protection must also have their learning needs prioritised in planning to ensure education is a protective factor and not only by way of regular attendance at school.
- Undertake a Prevent risk assessment which is shared with all staff

The full responsibilities of the DSLs are set out in [Annex C of KCSIE – Role of the designated safeguarding lead](#). All Designated Safeguarding Leads and Deputy Designated Safeguarding Leads must read and comply with this.

## The Governing Body

The governing body will approve this policy at each review and hold the Head to account for its implementation and any actions / recommendations made by the Local Authority in respect to strengthening the school's safeguarding arrangements.

The governing body will complete the LA safeguarding and child protection briefing on their strategic roles and responsibilities every three years including online safety training at induction. The governing board will ensure that all policies, procedures and training are effective and comply with the law at all times. The governing body will ensure that all staff undergo safeguarding and child protection training, including online safety training providing an understanding of the expectations and applicable roles and responsibilities in relation to filtering and monitoring.

Additional guidance on “appropriate” filtering and monitoring can be found at

- UK Safer Internet Centre: <https://saferinternet.org.uk/guide-and-resource/teachers-and-school-staff/appropriate-filtering-and-monitoring>. The UK Safer Internet Centre produced a series of webinars for teachers on behalf of the Department. These webinars were designed to inform and support schools with their filtering and monitoring responsibilities and can be assessed at [Filtering and monitoring webinars available – UK Safer Internet Centre](#).
- South West Grid for Learning ([swgfl.org.uk](http://swgfl.org.uk)) has created a [tool](#) to check whether a school or college's filtering provider is signed up to relevant lists (CSA content, Sexual Content, Terrorist content, Your Internet Connection Blocks Child Abuse & Terrorist Content).
- Support for schools when considering what to buy and how to buy it is available via the: [schools' buying strategy](#) with specific advice on procurement here: [buying for schools](#).

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- The Department has published [Generative AI: product safety expectations](#) to support schools to use generative artificial intelligence safely, and explains how filtering and monitoring requirements apply to the use of generative AI in education.

The governing body will appoint a lead governor to monitor the effectiveness of this and other related safeguarding policies (ie online safety, whistleblowing, behaviour etc.) in conjunction with the full governing body. Staff governors cannot be the lead governor with responsibility for safeguarding and child protection. Lead governors should access the LA designated safeguarding governor training every three years including online safety training at induction.

In the event that safeguarding concerns, or an allegation of abuse is made against the Head, the Chair of Governors will act as the 'case manager'.

The governing body will ensure that the school has robust IT filtering and monitoring systems in place and should be informed in part, by the risk assessment required by the Prevent Duty in order to limit children's exposure to online risks. The governing body should consider the number and age range of children, those who are potentially at greater risk of harm and how often they access the IT system.

The governing body, along with the school's senior leadership team, are responsible for satisfying themselves and obtaining written assurances from any relevant school lettings and alternative/off site providers and provisions that their safeguarding arrangements are secure, in keeping with the requirements set out in KCSIE. This includes ensuring that the provision has effective safeguarding policy / procedures/training in place for all staff. The provision follows safer recruitment processes and have clear allegation management processes. Pupils who attend alternative provisions can often have complex needs and it is important that these settings are aware of the additional risk of harm that their pupils may be vulnerable to, and appropriate risk assessments/support plans are in place where pupils access provision offsite.

Where the school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs.

The governing body will supply information as requested by the LSCP and the Local Authority Education Safeguarding Team.

The governing body will understand how to comply with data protection law, develop their data policies and processes, know what staff and pupil data to keep and follow good practices for preventing personal data breaches. [Data protection in schools - Guidance - GOV.UK \(www.gov.uk\) \(2024\)](#)

The full responsibilities of the governing body are set out in [Part Two of KCSIE - The management of safeguarding](#). The governing body will ensure that the school is fully compliant with their statutory safeguarding responsibilities.

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## The Head

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

- Ensuring that staff, (including temporary and supply staff), and volunteers are informed of 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 roles and responsibilities of the DSLs/DDSL as referenced in Annex C of KCSiE (2025), are reflected in their job description;
- Ensuring that the DSLs have appropriate time, training, and resources, and that there is always adequate cover if the DSLs are absent;
- Ensuring that they complete the one day LA course for Head Teachers / principals on safeguarding and child protection and that all staff undertake appropriate safeguarding and child protection training and update every three years;
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff (including supply staff) or volunteer, where appropriate;
- Ensuring that all recommendations made by the Local Authority in relation to strengthening the school's safeguarding arrangements are actioned in a timely fashion.

## Recruitment

The school pays full regard and commitment to following the safer recruitment, selection and pre-employment vetting procedures as outlined in Part 3 of Keeping Children Safe in Education 2025 (KCSiE).

The school will maintain a single central record which demonstrates the relevant vetting checks required including: a barred list check, DBS check at the correct level, identity, qualifications, prohibition order and right to work in the UK. (see Part 3 of KCSiE). Copies of documents used to verify the successful candidate's identity, right to work and required qualifications will be kept in their personnel file.

All recruitment materials will include reference to the school's commitment to safeguarding and promoting the wellbeing of pupils.

The school will ensure that all recruitment panels include at least one person that has undertaken relevant safer recruitment training.

For individuals who have lived or worked outside the UK, in addition to the same checks as all other staff, the school will complete any additional checks required to satisfy themselves that the individual is suitable to work with children. This may include obtaining a letter from the professional regulatory authority in the country (countries) in which the candidate has worked confirming that they have not imposed any

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sanctions or restrictions, and /or that they are aware of any reason why they are unsuitable to teach where possible.

The school will ensure that written risk assessments are undertaken in situations where information provided on DBS certificates necessitates so. Written risk assessments must be undertaken for all volunteers not engaging in regulated activity.

The school will inform shortlisted candidates that online searches may be done as part of due diligence checks.

### Data Protection

Whilst the [Data Protection Act](#) places duties on organisations and individuals to process personal information fairly and lawfully, GDPR is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children. Legal and secure information sharing between schools, children's social services and other local agencies is essential for keeping children safe and ensuring they get the support they need. Information may be shared with relevant school staff if it is necessary; this will be on a need to know basis and is strictly confidential. That member of staff must not share the information with any other member of staff without seeking permission from the Designated Safeguarding Leads (DSLs), Deputy DSL or Head. Information can be shared without consent if to gain consent would place a child at risk. Guidance to support schools with data protection activity, including compliance with the GDPR is provided in the [Data protection: toolkit for schools](#).

### Equality Statement

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:

- are disabled or have certain health conditions and have specific additional needs.
- have special educational needs (whether or not they have a statutory Education, Health and Care plan)
- have a mental health need.
- are a young carer.
- are showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- are frequently missing/goes missing from education, home or care.

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- have experienced multiple suspensions, are at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- are at risk of modern slavery, trafficking, sexual and/or criminal exploitation.
- are at risk of being radicalised or exploited.
- have a parent or carer in custody or is affected by parental offending.
- are in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- are misusing alcohol and other drugs themselves.
- are at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage.
- Are a privately fostered child.

### Gateways School: expectations of the Governing Body

The Governing body for Gateways School has overall responsibility for ensuring the safeguarding duties are fully implemented and followed. They are responsible for ensuring there are mechanisms in place to assist staff to understand and discharge their role and responsibilities as set out in Part One of KCSIE. The governors will ensure that robust internet filters and online monitoring systems are in place to ensure pupils are not able to access harmful or inappropriate material from the school IT system, and should be informed in part, by the risk assessment required by the Prevent Duty in order to limit children's exposure to online risks. The governing body should consider the number and age range of children, those who are potentially at greater risk of harm and how often they access the IT system.

The Safeguarding Governor will liaise with the Designated Safeguarding Leads over all matters regarding child protection issues. The role is strategic rather than operational, and therefore does not involve practical concerns about individual cases, although individual cases may be discussed. They will support the Designated Safeguarding Leads in their role from the perspective of ensuring the allocation of funding and resource is sufficient to meet the current safeguarding and child protection needs. They will receive governor safeguarding training upon appointment including on online safety and updated training every three years in line with the whole school staff refresher training. Appendix J – Part 1 outlines the role of the Safeguarding Governor. The Designated Safeguarding Lead, in consultation with the Safeguarding Governor, will carry out an annual review of safeguarding and child protection procedures to ascertain the efficacy with which the related duties have been discharged. A checklist is shown in Appendix J – Part 2 which will be used to show understanding of the procedures by staff. In addition, an audit of the Single Central Register (SCR) will be carried out to show compliance, see Appendix J – Part 3. These will be presented to the governors as confirmation that it is an accurate reflection of the safeguarding arrangements within the school.

The governors are responsible for agreeing and ratifying the Safeguarding and Child Protection Policy and Procedures following the annual review and update. The Safeguarding Governor will monitor the effectiveness of this and other related

safeguarding policies (i.e.: online safety (including filtering and monitoring), whistleblowing, behaviour etc).

The Governing Body will ensure that all staff undergo safeguarding and child protection training, including online safety training, as well as having an understanding of the expectations and applicable roles and responsibilities in relation to filtering and monitoring.

The Governing Body will complete safeguarding and child protection briefing on their strategic roles and responsibilities every three years including online safety training.

The governing board will ensure that all policies, procedures and training are effective and comply with the law at all times. In addition, governing board will ensure that child protection files are maintained as set out in Annex C of KCSiE 2025. They will receive a summary report of safeguarding and child protection matters three times a year, allowing details to be shared, without identification of the child.

### Gateways School: expectations of the DSL(s), Deputy DSL(s) and the wider Safeguarding Team

The Designated Safeguarding Leads (DSLs) will lead responsibility for safeguarding and child protection, they act jointly as the Head of Safeguarding and are members of the Senior Leadership Team. The DSL(s) are responsible for co-ordination of action within the school and liaison with other agencies, in accordance with The Leeds City Council Children's Services - Education Department procedures.

The DSL(s), Deputy DSL(s) and the wider safeguarding team members are most likely to have a complete safeguarding picture and will be the most appropriate people to advise on the response to safeguarding concerns.

Should any looked after children, who are in care, attend Gateways School Mrs Susan Wilson (SENCO – High School) is the Designated Teacher and she will ensure all the necessary information is obtained. Relevant information will be shared with staff on a need-to-know basis. The designated teacher will also promote the educational achievement of pupils. Statutory guidance is found in [The roles and responsibilities of the designated teacher](#).

The DSL(s), in liaison with the Safeguarding Team and Head, will:

- act as the main point of contact, providing support, advice and guidance to staff on child welfare and child protection matters;
- receive and act upon reported concerns;
- lead, manage and support staff who make referrals to the local authority children's social care or Channel programme (see section on **Making Referrals**);
- monitor, review and action support for pupil safeguarding concerns across the whole of the school, including online safety and understanding the filtering and

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monitoring systems which are in place). Refer to D f E Guidance [Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges-filtering-and-monitoring-standards-for-schools-and-colleges-guidance)

- promote the educational outcomes of children with a social worker and other pupils deemed vulnerable;
- recognise the additional risks children with SEND face online;
- monitor attendance to identify children who may be at risk;
- take responsibility for Online Safety within the school;
- monitor inappropriate internet use;
- encourage a culture of 'it could happen here';
- encourage a culture of listening to children and taking account of their wishes and feelings;
- ensure that there is support for children who are at risk, have been abused or who are harming themselves;
- where appropriate, keep staff informed of pupil concerns;
- ensure staff are familiar with, understand and adhere to their safeguarding responsibilities;
- encourage aspects of pupil personal safety, awareness and prevention within the school curriculum;
- communicate relevant safeguarding and child protection information and ensure all staff receive regular updates, at least annually;
- ensure that all relevant safeguarding contact names and numbers are available to staff and displayed in an accessible place at all times (see **Appendix A**);
- prepare safeguarding reports for consideration and discussion by the Governing body;
- refer cases where a person is dismissed or has left the school due to risk/harm to a child to the DBS and other agencies where appropriate;
- refer cases where a crime may have been committed to the police (refer to NPCC – [When to call the police](#) for guidance);
- carry out regular audits/reports on safeguarding as required to ensure best practise.

To support both pupil and relevant staff, the DSL(s) will inform appropriate staff, if confidentiality permits, of any concerns that have been expressed about a child on a need-to-know basis.

When a designated member of staff resigns their post or no longer has child protection responsibility, there will be a full face to face handover and exchange of information with the new post holder. In exceptional circumstances when a face-to-face handover is unfeasible, it is the responsibility of the Head to ensure that the new post holder is fully conversant with all procedures and case files.

### Making Referrals

When a pupil concern arises which results in a CPOMS entry or cause for concern form being completed and upon receipt of the form by the Designated Safeguarding Leads the following steps shall be taken by the safeguarding team:

- talk to the member of staff who completed the cause for concern;
- liaise with the Head, if necessary, to keep her informed of the concern;
- talk with the pupil, without asking leading questions (this may be with another member of staff in attendance), **Appendix C** gives details of **Dealing with a Disclosure of Abuse**;
- seek to establish the child's wishes to ascertain what is in the best interest of the child;
- if necessary, consult with the Child Protection advice team at Leeds Safeguarding Children Partnership, without disclosing the pupil's name;
- make contact with the parents/carers to inform them of the situation and any action which may be taken, but only if this does not lead to the child being put at further risk;
- if necessary, refer cases to children's social work services, within 24 hours, where appropriate;
- refer serious cases/crimes to the police (refer to NPCC – [When to call the police](#) for guidance);
- ensure the record is completed on CPOMS

**Appendix E** contains flow charts summarising the steps to take if there is a child protection concern (**Part 1**) and specifically radicalisation (**Part 2**) and CSE (**Part 3**).

Where appropriate and in consultation with any social worker involved, the pupil will be supported by meetings with the appropriate staff members: Head, DSL9s), Head of Prep, Key Stage Pastoral Lead, Form Tutor or Class Teacher. Such meetings will also keep the pupil informed of relevant progress, action and channels of communication which are being kept open. These may be with outside agencies and parents.

Depending on the individual case, and in consultation with any social worker, parents of the pupil may be similarly involved. Parents may be advised to seek the help of other professional bodies, including the GP, both for medical attention and for referral to other experts, as appropriate.

It is good practice to seek consent from the child or their parent before sharing information. Children over the age of 12 years are considered to have the capacity to give or withhold consent to share their information, unless there is evidence to the contrary; therefore, it is good practice to seek their views. If the young person is over

16, they should be involved in decision-making about information sharing, unless they do not have the capacity to give consent.

However, consent is not always a condition for sharing and sometimes we do not inform the child or family that their information will be shared, if doing so would:

- place a person (the child, family or another person) at risk of significant harm;
- prejudice the prevention, detection or prosecution of a crime;
- lead to unjustified delay in making enquiries about allegations of significant harm to a child or serious harm to an adult.

Consent should not be sought if the establishment is required to share information through a statutory duty, e.g. Section 47 of the Children Act or court order.

### Working with Others

#### School Staff

The safeguarding team will regularly review children in need within the school with staff responsible for each section of the school: EYFS and Prep, High School and Sixth Form. The purpose of these meetings is to monitor known pupils and to identify other pupils in need, ensuring actions plans are in place to support. All meetings are routinely minuted.

The safeguarding team will liaise with the Head on all matters of child protection to inform her of issues especially ongoing enquiries under Section 47 of the Children Act 1989 and police investigations.

The DSL(s) will liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral, as appropriate and necessary. In keeping with KCSiE, where reasonably possible, we will hold more than one emergency contact number for each pupil or student, including where a welfare and/or safeguarding concern is present. This goes beyond the legal minimum.

#### Other Agencies

Information sharing is vital in identifying and tackling all forms of abuse, especially in identifying and preventing child sexual exploitation. The safeguarding team will co-ordinate information and develop communication between the school and other agencies as appropriate, according to inter-agency statutory guidance [Working Together to Safeguard Children](#).

The school will fully support all child protection procedures and will provide information to and, if requested, send a representative to appropriate inter-agency meetings, such as Child in Need, Initial and Review Child Protection Conferences. Any

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written report will, wherever possible, be shared with parents/carers at least 24 hours prior to the meeting.

The safeguarding team will:

- provide co-ordinated support for Early Help assessments;
- ask to be informed of the timing of the strategy discussion between the statutory agencies which will decide whether and how to investigate;
- clarify with the investigating agencies when, how and by whom the parents and the pupil will be told that a referral has been made;
- liaise with the case manager and the designated officer(s) at the local authority for child protection concerns;
- contribute to the strategy discussion her knowledge of the pupil.

If the school places a pupil with an alternative provision provider, Gateways will continue to be responsible for the safeguarding of the pupil. The DSL(s) will satisfy the school that the provider meets the needs of the pupil. The DSL(s) will obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment.

Schools should always know where a child is based during school hours. This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. They should regularly review the alternative provision placements they make. Reviews should be frequent enough (at least half termly) to provide assurance that the child is regularly attending and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the placement should be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, the school will, working in partnership with the LA and other key professionals invite parents/carers to a meeting where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of the child. This is especially important where a child has SEND, is vulnerable, and/or has a social worker.

### **Child Protection Records**

The responsibility to maintain, process, share, transfer and store child protection and safeguarding records in accordance with the Data Protection Act 2018 and the GDPR principles is the responsibility of the DSLs and safeguarding team. In addition, governing bodies and proprietors should ensure that child protection files are maintained as set out in Annex C of KCSiE 2025. Child protection information will be

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held securely, with access being restricted to the DSLs and their deputies, head teacher and in cases of Early Help, the nominated lead professional, if this is not a designated safeguarding lead/officer. For further information please see Early Help. The following information must be kept securely with restricted access, whether paper or electronic:

- Chronology (summary of significant events and the actions and involvement of the school/college)
- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome.
- All completed child protection cause for concern records
- Any child protection information received from the child's previous educational establishment
- Records of discussions, telephone calls and meetings with colleagues and other agencies or services
- Professional consultations
- Letters and emails sent and received relating to child protection matters
- Referral forms sent to CSWS, other external agencies or education-based services
- Minutes or notes of meetings, e.g. child protection conferences, core group meetings, etc., copied to the file of each child in the family, as appropriate
- Formal plans for, or linked to, the child e.g. child protection plans, Early Help (previously known as CAF's), risk assessments etc
- A copy of any support plan for the pupil concerned

Where a pupil leaves their existing provision, the school will ensure that the child protection file is transferred securely and separately from the main pupil file to the receiving school/educational establishment (where this is known) as soon as possible and within five school days. This is a legal requirement set out under regulation 9 (3) of 'The Education (Pupil Information – England) Regulations 2005. A copy of the chronology must be retained for audit purposes.

Where there is an existing risk management plan/assessment in place for behaviours that are deemed potentially harmful to the pupil or others (i.e. self-harming or harmful sexualised behaviour), this information must be shared with the destination provision prior to the pupil starting so that appropriate care and control measures can be put in place to mitigate the potential of any risk of further harm occurring. The DSLs will also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving, for example prior to a transfer programme.

Where a child leaves a school before statutory school leaving age, the child protection file must be transferred to the new school or college. There is no need to keep written or electronic copies of the child protection records, therefore these will be deleted from electronic systems once the successful transfer has been confirmed. The exception to this rule will be in any of the following instances:

Where a vulnerable young person is moving to a Higher Education establishment, consideration will be given to the pupil's wishes and feelings about their child protection information being passed on, in order that the HE establishment can provide appropriate support. In cases where it is deemed appropriate, relevant child protection information must be shared via the HE Safeguarding Information Sharing Form only. The original records will be retained and archived by the school/college. Due consideration must be given to the sharing of any additional information requested by the receiving establishment.

- Where the destination school is not known (the original records will be retained by the school/college)
- Where the child has not attended the nominated school (the original records will be retained by the school/college)
- There is any on-going legal action (the original file will be retained by the school and a copy sent)
- Where a child moves to a different school outside of the Leeds authority a copy of the child protection record will be retained for reference.

Pupil records will be transferred in a secure manner, for example, through secure electronic file transfer or by hand. When hand-delivering pupil records, a list of the names of those pupils whose records are being transferred and the name of the school/college they are being transferred to must be made and a signature obtained from the receiving school/college as proof of receipt. When sending records through secure electronic file transfer, a delivery and read receipt of the must be retained for audit purposes.

If a pupil moves from our school, child protection records will be forwarded onto the named DSLs at the new school, with due regard to their confidential nature. Good practice suggests that this will always be done with a face-to-face handover between designated staff or a verbal conversation is had over the telephone if a face-to-face handover is not possible. A signed receipt of file transfer or electronic delivery and read receipt (delete as appropriate) must be obtained for audit purposes by the delivering school.

If sending by post, children records will be sent "Special Delivery". A note of the special delivery number will also be made to enable the records to be tracked and traced via Royal Mail.

For audit purposes a note of all pupil records transferred or received will be kept in either paper or electronic format. This will include the child's name, date of birth, where and to whom the records have been sent, and the date sent and/or received. A copy of the child protection chronology will also be retained for audit purposes and kept securely.

If a pupil is permanently excluded and moves to an alternative or specialist provision, child protection records will be forwarded onto the relevant organisation in accordance with the 'The Education (Pupil Information – England) Regulations 2005, following the above procedure for delivery of the records.

If a parent chooses to electively home educate (EHE) their child, the school will contact the EHE team on [ehe@leeds.gov.uk](mailto:ehe@leeds.gov.uk) or 0113 3785028 for information on where the child protection record must be sent.

When a DSL member of staff resigns their post or no longer has child protection responsibility, there will be a full face to face handover/exchange of information with the new post holder.

In exceptional circumstances when a face-to-face handover is unfeasible, it is the responsibility of the head teacher to ensure that the new post holder is fully conversant with all procedures and case files.

All DSLs receiving current (live) files or closed files must keep all contents enclosed and not remove any material.

All receipts confirming file transfer must be kept in accordance with the recommended retention periods. For further information refer to the archiving section.

### **Children's and Parents' Access to Child Protection Files**

Under Data Protection legislation (General Data Protection Regulation & Data Protection Act 2018) a pupil or their nominated representative have a number of legal rights in respect of information relating to them. These rights include the right to access and the right to rectification of inaccurate data. Therefore, all information will be accurately recorded, objective in nature and expressed in a professional manner.

Any child who has a child protection file has a right to request access to it. However, neither the child nor the parent has an automatic right to see all the information held in child protection records. Information can be withheld if disclosure:

- could cause serious harm or is likely to cause serious harm to the physical or mental health or condition of the child or another person; or
- could reveal that the child or another person has been a subject of or may be at risk of child abuse, and the disclosure is not in the best interests of the child; or
- is likely to prejudice an on-going criminal investigation; or
- information about the child also relates to another person who could be identified from it, or the information has been given by another person who could be identified as the source, unless the person has consented to the disclosure or the person providing the information is an employee of the establishment or the Local Authority.

It is best practice to make reports available to the child or their parents unless the exceptions described above apply.

The establishment's report to the child protection conference will (wherever possible) be shared with the child, if old enough, and parent at least two days before the conference.

### **Archiving**

The school that the pupil attended until statutory school leaving age (or the school where the pupil completed Sixth Form studies) is responsible for retaining any child protection records they may hold. The recommended retention period is 35 years from closure when there has been a referral to CSWS. If no referral has been made to CSWS, the child protection record will be retained until the child's 25th birthday, after which point the file will be destroyed confidentially/deleted (please delete as appropriate) from our electronic system. The decision of how and where to store child protection files will be made by the school via the governing board. Due to sensitivity of the information, the records will continue to be held in a secure area with limited access e.g., designated officer or head teacher. The DSLs are responsible for ensuring that all CP files are archived in accordance with the timescales referenced above. The DSLs are responsible for ensuring that the appropriate timeframes for archiving and destroying child protection records referenced above are set on electronic systems accordingly for each pupil.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

### **Safe Destruction of the Pupil Record**

Where records have been identified for destruction, they will be disposed of securely at the end of the academic year (or as soon as practical before that time). Records which have been identified for destruction will be confidentially destroyed, this is

because they will either contain personal or sensitive information, which is subject to the requirements of Data Protection legislation, or they will contain information which is confidential to school or the Local Education Authority. Information will be shredded (or deleted as appropriate) prior to disposal or confidential disposal can be arranged through private contractors. For audit purposes the school will maintain a list of records which have been destroyed and who authorised their destruction. This can be kept securely in either paper or an electronic format.

## Training

The DSL(s), Deputy DSL(s) and the safeguarding team will receive training in safeguarding and child protection to provide them with the knowledge and skills required to carry out the role. This will include the initial 3-day Children's Services Education child protection training course (or equivalent), the multi-agency Working Together to Safeguard Children and Young People.

Additional training in the following should also be undertaken:

- Early help
- Child protection conferences & reviews
- Understand GDPR & sharing information
- Prevent duty awareness and Channel
- Online safety
- Honour based abuse
- Child sexual exploitation
- Child criminal exploitation, county lines and serious violence
- Domestic abuse
- Peer on peer/ child on child abuse
- Sexual violence and sexual harassment
- Private fostering

Their safeguarding training will be updated **every two years**. This training can be provided by the local children's services department or an alternative accredited external agency.

In addition to their formal training, as set out above, the Designated Safeguarding Leads and safeguarding team will update their knowledge and skills (for example via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments), at regular intervals, but at least annually, to keep up to date with any developments relevant to their role.

The Designated Safeguarding Leads and safeguarding team will access and share relevant resources and attend any relevant or refresher training courses, as necessary.

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The purpose of training and updates is to:

- understand the assessment process for providing Early Help and intervention;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- be able to carry out induction safeguarding and child protection training for new staff;
- ensure each member of staff has access to and understands the school's safeguarding and child protection policy and procedures;
- be alert to the specific needs of children in need;
- be able to keep detailed, accurate, secure written records of concerns and referrals;
- keep up to date with developments in safeguarding and child protection;
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- be a source of advice and expertise within the school for safeguarding and child protection;
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff.

### **Raising Awareness**

The DSL(s) and Safeguarding Team have an important part to play in raising awareness of safeguarding and child protection matters within the school.

They should:

- ensure the school safeguarding and child protection policy and procedures is known, understood and used appropriately;
- ensure staff receive safeguarding and child protection updates, including online safety information, as required, but at least annually, so that they have up to date knowledge;
- ensure the board of governors are aware of their strategic responsibilities with respect to safeguarding by updating them on relevant safeguarding and child protection matters and providing them with review three times a year;
- ensure the safeguarding and child protection policy and procedures, included referenced policies and procedures are reviewed annually;
- ensure the safeguarding and child protection policy and procedures is available publicly and parents/carers are aware of the fact that referrals about suspected

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abuse, neglect or exploitation may be made and the role of the school or college in this;

- update parents/carers on relevant safeguarding issues, as necessary;
- ensure parents/carers are aware that Gateways is covered by the Leeds Joint Agency Protocol for Domestic Violence and Abuse – School Notifications Procedures;
- link with the local LSCP to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

### Private Fostering

Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Where this situation arises, the safeguarding team will notify the local authority where the child is residing to allow the local authority to check the arrangement is suitable and safe for the child. Full statutory guidance can be found in [Children Act 1989 Private Fostering](#).

### Gateways School: expectations of all staff

All staff, including the Head, temporary/supply staff and volunteers must:

- receive a copy of and read Keeping Children Safe in Education – Part one: Safeguarding information for all staff so that they understand their role and responsibilities with regard to safeguarding and child protection, and staff who work directly with pupils receive a copy of and read Keeping Children Safe in Education – Annex B; staff who do not work directly with children will read either Part 1 or Annex A as determined by the DSLs dependent on their roles, responsibilities and contact with children;
- be familiar with and understand the school's safeguarding and child protection policy and procedures, including issues of confidentiality;
- have an attitude of 'it could happen here' where safeguarding is concerned;
- be aware of the different types of abuse and alert to signs of abuse;
- be aware of, and understand their obligation to fulfil, other safeguarding and welfare responsibilities including, but not limited to:
  - Children missing or absent from education
  - Child Sexual Exploitation (CSE)
  - Child Criminal Exploitation (CCE)
  - Child-on-child sexual abuse.
  - Honour Based Violence (HBV) including Female Genital Mutilation (FGM) and forced marriage
  - Domestic abuse and violence

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- Children at risk of radicalisation
- Peer on peer / child on child abuse
- Sexual violence and sexual harassment between children in school
- Online safety and online abuse
- Children with family members in prison
- Homelessness;
- be aware that children can abuse children; this is referred to as child-on-child abuse;
- be aware that children absent from education or missing/absconding during the school day can also be a sign of a range of safeguarding concerns including sexual abuse, sexual exploitation or child criminal exploitation.
- understand that children may not feel ready or know how to tell someone that they are being abused, exploited, neglected, and/or they may not recognise their experiences as harmful;
- respond to the signs of abuse at the earliest opportunity;
- identify children who may benefit from early help;
- know how to raise concerns about a pupil;
- deal with disclosures as advised, but not investigate;
- record concerns on CPOMS or a 'Cause for Concern' form;
- discuss any safeguarding or child protection pupil concerns with the Designated Safeguarding Leads or wider safeguarding team;
- be aware that children who suffer or are likely to suffer significant harm must be reported to children's social services immediately;
- be aware that anyone can make a referral to children's social services;
- be involved with appropriate ongoing monitoring and recording to support implementation of individual programmes;
- understand the school's expectation with regard to the use of mobile phones and image recording devices as detailed both in Appendix G and separately in the school's Electronic communications and internet acceptable use policy and E-Safety policy;
- ensure that all visitors to the site are duly signed in at Reception and accompanied at all times on school premises;
- read, understand and comply with the Gateways Staff Code of Conduct and Practice which outlines staff expectations.

### Safer Working Practices

Guidance given to staff in line with [Safer Recruitment Consortium](#) advice aims to ensure that their behaviour and actions do not place pupils or themselves at harm or put themselves at risk of allegation of harm to a pupil.

A sensible approach to any of the following must be adopted:

- a pupil developing an infatuation;

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- giving intimate or personal care; assisting young children with toileting or providing medical care (see Gateways Intimate Care Policy & Procedures);
- comforting a child; this may, particularly with younger children, give reassurance, but staff need to respond sensitively and be aware that innocent actions can be misconstrued;
- giving one-to-one tuition, a lesson outside the curriculum, personal or academic tutoring, private detention, a reprimand, transport to a pupil by car, toilet visit as part of a duty;
- coaching sports;
- pre-arranged meetings with pupils away from the school;
- use of cameras, mobile devices and other forms of electronic communication (see Appendix G);
- restraining physically - physical intervention may only be used to avert 'an immediate danger of personal injury to, or an immediate danger to the property of, a person (including the pupil).

There are circumstances when it is appropriate for staff to use reasonable force to safeguard children. The term 'reasonable force' covers the broad range of actions that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or the need to restrain to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom. The decision on whether or not to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned and should always depend on individual circumstances. It must be the minimum that is required, be calm and measured. Staff should recognise that children with SEN, disabilities or medical conditions have additional vulnerabilities, and the additional risks should be carefully considered. The use of reasonable force to control pupils or restrain them is in line with DfE [Use of reasonable force Advice for headteachers, staff and governing bodies](#). Any use of force is reported to the Head and the parents of the child as soon as possible. Corporal punishment is prohibited.

The sensible approach that staff should take involves having doors open, giving other staff easy access to your working environment, avoiding remote or secluded areas, informing others of your plans and using school equipment only for electronic communication and photography. Reporting and recording of incidents and maintaining professional boundaries are vital. If any member of staff is aware they are putting themselves or have put themselves in a vulnerable situation they should report the incident on CPOMS or by completing a Low-level Concern Reporting Form. This form can also be accessed via this link: <https://forms.office.com/e/D1SPZfpfMz>

Staff are reminded it is a criminal offence for a person to have an indecent photograph or pseudo-photograph of a child in their possession. It is also a criminal offence for a

person aged 18 or over, 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, in the case of those over 16, the relationship is consensual. This is extended to any pupil on the school roll, who is over the age of 18. Although it may not be a criminal offence, it is a disciplinary matter, even if the relationship is consensual.

These are serious criminal offences. Knowledge of such an offence would be reported to the police and Independent Safeguarding Authority. The member of staff will be suspended for the duration of the investigation.

### Types of Abuse and Indicators

There are four categories of abuse; neglect, physical, sexual and emotional. Definitions and details of the signs and indicators can be found in Appendix B Part 1 and 2.

These signs may include:

- significant changes in a child's behaviour;
- deterioration in a child's general well-being (mental and physical health);
- unexplained bruising, marks or signs or possible abuse, neglect and exploitation;
- comments made by a child which give cause for concern;
- any reasons to suspect exploitation, neglect or abuse outside the school setting, for example in the child's home;
- inappropriate behaviour displayed by other members of staff, or any other person working with the child, for example:
  - inappropriate sexual comments;
  - excessive one-to-one attention beyond the requirements of their usual role and responsibilities;
  - inappropriate sharing of images.

### Specific Types of Safeguarding Issues

This school follows the Leeds LSCP online locally agreed multi-agency procedures, in circumstances where children are at risk of or specific forms of abuse as outlined in Part 1 and Annex of B KCSIE. Staff should be aware of some specific forms of abuse:

- Honour Based Violence, Female Genital Mutilation (FGM) and forced marriage (see Appendix B Part 4);
- Child Sexual Exploitation (see Appendix B Part 4);
- Child criminal exploitation: county lines (see Appendix B Part 4);
- Serious violence (see Appendix B Part 4);
- Domestic abuse and violence (see Appendix B Part 4);
- Radicalisation (see Appendix B Part 4);
- Sexual harassment or violence concerns, including upskirting (see Appendix B Part 5);

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- Peer on peer / child on child abuse including bullying, cyberbullying, sexting and sexual violence and sexual harassment (see section Allegations Against Other Pupils and Appendix B Part 5).

### Other risk factors

These may include but may not be limited to:

- child missing from home or care and missing or absent from education;
- fabricated or induced illness;
- faith abuse;
- gangs and youth violence;
- hate crimes;
- adult mental health within the family;
- private fostering;
- relationship abuse;
- trafficking;
- disabled or has special educational needs;
- young carer;
- misusing drugs;
- children attending court;
- children with family members in prison;
- homelessness.

### Staff Action in response to a concern

#### Early Help

All school staff should be vigilant and identify children who need additional help may benefit from Early Help.

Any child may benefit from early help, but staff should be particularly alert to the potential need for Early Help for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, serious violence,
- including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home;
- is misusing drugs or alcohol themselves;
- is at risk of modern slavery, trafficking or exploitation;

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- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to their family from care;
- is showing early signs of abuse, neglect and / or exploitation;
- is at risk of being radicalised or exploited;
- is a privately fostered child;
- is attending court;
- has a family member in prison.

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. This can be stressful time for children and additional support will provided in these circumstances.

Children with a parent sent to prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. This can be stressful time for children and additional support will provided in these circumstances.

Staff should not assume other staff will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and support.

Early Help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. In the first instance, staff should discuss Early Help requirements with a member of the safeguarding team. Initially this would be through the pastoral system but support from other agencies and professionals may be involved in an Early Help assessment. If a formal Early Help assessment is appropriate, a member of the safeguarding team will lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support an Early Help assessment, in some cases acting as the lead professional. Children identified as needing Early Help and or other support will be kept under constant monitoring and review with the consideration given to a referral to children's social services if the child's situation does not appear to be improving.

### **Abuse and Significant Harm**

If a member of staff suspects a child is being abused, has suffered or is likely to suffer significant harm, including one child against another, they must share the information immediately with a member of the safeguarding team either on CPOMS or by the completion of a cause for concern form (see Appendix D Part 1). Staff must not investigate a disclosure as this could prejudice possible future legal action. Parents with a cause for concern should inform the safeguarding team without delay. The safeguarding team will refer this information to the children's social care and/or police immediately.

Further advice can be found in the government guideline '[What to do if you are worried a child is being abused – Advice for practitioners](#)' and the [NSPCC](#) website.

Children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. A child who is absent as well as missing from education is a potential indicator of abuse, neglect or exploitation, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of Female Genital Mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. See Gateways Children Missing Education Procedure for further details.

## **Mental Health**

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 are in a good position to monitor and identify changes in pupil wellbeing, including possible mental health concerns.

Where children have suffered abuse, neglect or exploitation, or other potentially traumatic adverse childhood experiences (ACEs), this can have a lasting impact throughout childhood, adolescence and into adulthood. These children's experiences can impact on their mental health, behaviour and education. The education outcomes of these pupils will be monitored to ensure the correct level of support is provided, enabling them to make progress.

If staff have a mental health concern about a child that is also a safeguarding concern, this should be immediately raised with the Designated Safeguarding Leads and logged on CPOMS/a Cause for Concern form completed.

## **Pupil Disclosures**

Knowledge of abuse can arise from a pupil talking to a member of staff. The staff member will be aware that disclosing abuse is often an act of considerable bravery on the part of the child and often an indication that the pupil has particular trust in the staff member to whom the disclosure is made.

Any staff member who receives information from a child suggestive of abuse should listen attentively, without any negative response and particularly without any expression suggesting incredulity or any doubt in the truth of the pupil's account. Care should be taken not to ask any leading questions which could be seen as 'putting words in the pupil's mouth.' Staff must not take images of a child's injury, bruising or similar following a disclosure of abuse or make audio recordings of a disclosure.

Further guidance on dealing with a disclosure is given in Appendix C.

Pupils may ask for a promise that what they say will be kept secret. This cannot be promised but the pupil should be reassured that only those people who have to know will be told, however the interests of the child should be central. The pupil will be told who this is, with relevant reasons.

As soon as possible after the disclosure a full note on either CPOMS or a cause for concern form (Appendix D Part 1), should be made of everything said, including the child's demeanour and the circumstances leading to the disclosure. The time, date, place of, and those present at, the discussion are also noted together with the member of staff's signature. The notes may later be used in subsequent court proceedings. The cause for concern form should be immediately passed to the safeguarding team.

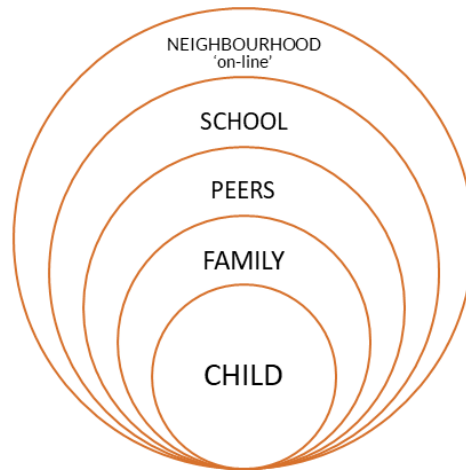
The safeguarding team will ensure the child's wishes or feelings are taken into account as well as what is in the child's best interests when determining what action to take and what services to provide to protect individual children. The child should be allowed to express their views and give feedback.

All staff should maintain an appropriate level of confidentiality whilst liaising with other members of staff.

### **Extra-Familial Harms**

Safeguarding incidents and/or behaviours can be associated with other factors. Extra-familial harms consider both the context of children's experiences within their family home and in other social spaces, including in the local neighbourhood or online, their school or their peer group. It takes a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

The context within which such incidents and/or behaviours occur will be considered and an assessment of children will consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. This information should be passed to children's social services as part of any referral process as it will allow any assessment to consider all the available evidence and the full context of any abuse. This diagram illustrates the different environments, including online.



### Making a Referral

The safeguarding team are responsible for referring all cases of suspected abuse to children's social service duty and advice team as soon as possible. However, anyone can make a referral, wherever possible this should be done through the appropriately trained member of the safeguarding team, and in any case the safeguarding team should be informed as soon as possible. Parental permission is not required, but if the child is not likely to be put at risk, then it is advisable to contact parents before making a referral. The procedures to follow are summarised in Appendix E and contact details are given in Appendix A. If after a referral, the child's status does not improve that member of staff or another member should instigate a re-referral.

All relevant contact details are listed in Appendix A and flow charts setting out the process for staff when they have concerns about a child as shown in Appendix E. The Reporting child abuse online tool <https://www.gov.uk/report-child-abuse-to-local-council> directs you to your local children's social care contact number.

If after a referral the child's situation does not appear to be improving the safeguarding team (or the person that made the referral) should contact the children's social care services and press for re-consideration to ensure their concerns have been addressed and that the child's situation improves.

### Children Who Need a Social Worker

Children may need a social worker and be under a Child in Need or Child Protection Plan. This may be due to safeguarding or welfare needs, such as abuse, neglect, exploitation or complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educational disadvantages such as attendance, learning, behaviour and mental health. The safeguarding team will hold information on which children have a social worker and will use this information to make decisions that are in the best interests of the child's safety, welfare and educational outcomes. Appropriate pastoral and academic support will be put in place. This information may need to be shared with other staff to facilitate additional support

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and monitoring, this will be on a strict need to know basis and should not be discussed and shared with other members of staff.

### Staff Training

All staff will complete the following training in safeguarding and child protection matters.

- Prior to joining all new staff, volunteers and temporary workers will have an induction session during which they will receive a copy of the latest edition of Keeping Children Safe in Education Part 1 and Annex B, these must be read and understood.

All staff will be told of the arrangements for:

- safeguarding and child protection;
- the role and identity of the DSLs Deputy DSL and safeguarding team;
- expected staff code of conduct;
- pupil behaviour;
- electronic communication and internet acceptable use;
- reporting concerns in relation to filtering and monitoring;
- whistleblowing;
- children missing education.

All staff will be given copies of the following documents, which must be read:

- Keeping Children Safe in Education Part 1 or Annexe A (as appropriate);
- Safeguarding and Child Protection Policy and Procedures;
- Staff Code of Conduct and Practice;
- Electronic Communications and Internet Acceptable Use Policy;
- Children Missing Education Procedures;
- Whistleblowing Policy and Procedure;
- Behaviour, Discipline and Exclusions Policy;
- Anti-bullying Policy and Procedures;

All staff will complete additional training on sexual harassment and sexual violence in schools.

All staff will receive safeguarding and child protection updates, including Online Safety information (e.g. via email, e-bulletins and/or staff meetings), as required, but at least annually, so that they have up to date knowledge. Training will include briefings on how to manage a report of child-on-child sexual violence or harassment and on the government's anti-radicalisation strategy, PREVENT, to enable staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas

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All staff will receive refresher safeguarding and child protection training at least once every three years to provide them with relevant skills and knowledge to safeguard children effectively.

Note EYFS Safeguarding Reforms Oct 2024 says - Training must be renewed every two years. Providers may consider whether any staff need to undertake annual refresher training during any two-year period to help maintain basic skills and keep up to date with any changes to safeguarding procedures or as a result of any safeguarding concerns that occur in the setting.

All contractors must follow the school's signing in arrangements as set out in contractual commissioning agreements.

### **Allegations Against Other Pupils**

Children are capable of abusing other children, this is generally referred to as child-on-child abuse is most likely to include, but not limited to:

- abuse within intimate partner relationships;
- bullying (including cyberbullying);
- sexual violence and sexual harassment;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- upskirting;
- initiation/hazing type violence and rituals.

Abuse should never be tolerated or passed off as banter, part of growing up or boys being boys. The school has a zero-tolerance approach to such attitudes and behaviours. Staff are aware that it is recognised there is often a gendered nature of peer on peer / child on child abuse; it is more likely that girls will be victims and boys perpetrators.

We will take steps to minimise the risk of child-on-child abuse by ensuring students recognise behaviour that is not appropriate and understand how to stay safe and challenge and report unwanted behaviours. We will also regularly review the school site and school activities to further minimise the risk of child-on-child abuse occurring.

We recognise that abuse can often go unreported or be reported latterly. We will encourage and support students to report child-on -child abuse to trusted adults in school or the NSPCC helpline.

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.

All concerns around child-on-child abuse will be taken seriously, reported, investigated, recorded and managed in line with the child protection procedures outlined in this policy. The school will ensure that at least one member of the school's safeguarding team has completed the one day LA training on understanding and managing harmful sexual behaviour in education settings. The safeguarding team are responsible for providing support to all children involved in incidents of child-on-child sexual abuse. Where incidents of child-on-child abuse involve children attending another school setting we will liaise with the relevant DSLs/DO at the setting to ensure appropriate information is shared.

Gateways recognises that sexual violence and/or sexual harassment can happen anywhere including educational settings. Where concerns of sexual violence or sexual harassment are witnessed, disclosed or reported to the school (including those that have happened outside of school or online) the concern will be taken seriously. It is recognised that sexual violence and harassment exist on a continuum and may overlap; they can occur online and face to face (both physical and verbal) and are never acceptable. In responding to such concerns DSLs must (where appropriate) always complete an AIM (Assessment, Intervention, Moving On) checklist and contact the Duty and Advice team if appropriate and follow the principles set out in Part 5 of KCSiE and the DfE guidance on Sexual Violence and Sexual Harassment (2021).

The school will ensure that the needs of children who may have/have sexually harmed others will be considered separately from the needs of those who have/may have been subject to sexual harm. Where appropriate support plans will be put in place for children subjected to sexual harm. Children who have/may have sexually harmed others will be responded to in a way that meets their needs as well as protecting others within the school community through a multi-agency risk assessment management plan (RAMP). Where appropriate there must be a coordinated multi-agency approach to risk assessment which will include involvement of parent/carers, social care, health, police and youth justice (where appropriate). From a best practice perspective, the RAMP should be independently chaired. Further support and advice on AIM Checklists and/or undertaking a RAMP can be obtained from the Education Safeguarding Team.

All children who may have/have been sexually harmed will be taken seriously and that they will be supported and kept safe.

In cases where allegations of sexual violence and/or harassment are found to be unsubstantiated, unfounded, false or malicious, the safeguarding team will consider whether the child or person who has made the allegation is in need of support or may have been abused by someone else. In cases where the report is found to be deliberately invented or malicious the school will consider whether it is appropriate to take any disciplinary action in keeping with the school's behaviour management policy.

Further information can be found in Appendix B Part 5. Further advice can be found in the legislation [Sexual violence and sexual harassment between children in schools and](#)

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[colleges](#) and on the NSPCC website [Harmful sexual behaviour - Signs, indicators and effects](#). The government provides guidance in a number of documents [Sexting in schools and colleges](#).

All concerns should be reported on CPOMS and safeguarding staff will ensure they are addressed under the appropriate procedure. Procedures for dealing with cases of bullying are outlined in the Gateways Anti-Bullying Strategy document.

In the event of an allegation of abuse of one child by another, or by a group of children, the matter is taken seriously. Depending on the nature of the incident it will be dealt with initially through the school's Anti-Bullying Strategy, Behaviour Policy and/or the Safeguarding and Child Protection Policy and Procedures.

### Guidance Given to Pupils

Gateways seeks to create a caring, learning environment free from disruption, violence, bullying, including homophobic abuse, or any form of prejudice or harassment. We will identify and provide opportunities for children to develop skills, concepts, attitudes and knowledge to promote their safety and well-being. Strategies employed to minimise bullying and abuse include, but are not limited to, themed assemblies, special presentations or workshops, PSHE curriculum, subject curriculum material on prejudice, racism and tolerance. The school ethos should ensure that children are treated with respect and dignity, feel safe and are listened to.

No-one should feel threatened or intimidated, or uncomfortable. Staff are vigilant for signs of harassment, bullying, violence or abuse and will immediately address any behaviour of this nature through the Anti-Bullying Strategy and Behaviour Policy.

Gateways has a role to play in the prevention of abuse through the guidance and support we provide. Pupils are encouraged to have respect for others and to believe that any kind of bullying, including being the onlooker or bystander, is totally unacceptable, as is prejudice-based language.

Pupils will be taught how to keep themselves safe within PSHE lessons, assemblies and talks as appropriate. For example, self-esteem, assertiveness, power, sex and relationship education including consent and sexting (information on the statutory guidance can be found here [Guidance](#)

[Relationships education, relationships and sex education \(RSE\) and health education](#)), online safety, CSE, extremist views and anti-bullying.

Online Safety education takes place, additionally within ICT lessons and the annual safer internet day assembly. The school's E-Safety policy is reflective of the

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requirements set out in KCSiE (2025) in regard to content, contact, conduct and commerce as defined below

- **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If pupils, students or staff are deemed to be at risk, this should be reported to the Anti-Phishing Working Group (<https://apwg.org/>).

The school's E-Safety policy is aligned to the school behaviour policy and reflects our approach to issues of online safety (including the sharing of nudes and semi-nudes) that empowers us to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.

Information on appropriate use of electronic devices is contained within the Electronic Communications and Internet Acceptable Use Policy. Other relevant issues will be addressed through specific areas of the curriculum, for example, form time, English, History, Drama and Art.

The school will ensure that children are taught about safeguarding, including online safety, and recognise that a one size fits all approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children may be needed.

Gateways' staff and pupils are aware of the Anti-Bullying Strategy and Behaviour Policy and the Sex and Relationships Education Policy.

Sixth Form prefects/senior students receive information on safeguarding and child protection during their induction training.

## Support Given to Pupils

Pupils have a number of avenues available to them for receiving help and support; these include class teachers, form tutors, subject staff and the school's trained counsellor.

Gateways will ensure that the needs of the accused are considered separately from the needs of their victims, both will be offered appropriate support, and both will be considered to be 'at risk'. An individual support plan will be devised, implemented and reviewed regularly for these children. The plan will detail areas of support, who will be involved, and the child's wishes and feelings. A written outline of the individual support plan will be kept in the pupil's child protection file. The school will work in partnership with parents/carers and other agencies as appropriate. Children that abuse others will be responded to in a way that meets their needs as well as protecting others within the school community through a multi-agency risk assessment.

If there is reasonable cause to suspect that the child is suffering, or likely to suffer, or liable to suffer significant harm, the matter will be immediately referred to children's social work services as a child protection concern, and with the expectation that all children involved, whether the perpetrator or victim, are treated as being at risk.

Where children and young people have exhibited sexually inappropriate/harmful behaviour and/or abused others, there will be a co-ordinated multi-agency approach, in the way of an AIM risk assessment, to respond to their needs, which will include, parent/carers, youth justice (where appropriate), children's social work service and health professionals. For children who have sexually harmed or may have sexually harmed peers, a RAMP will be completed that includes safety and support planning.

For pupils who may be concerned about their own or someone else's sexual thoughts and behaviour the Lucy Faithfull Foundation resource, [Shore Space](#), will be suggested as a resource they might find helpful.

## Sharing Nudes or Semi-Nudes - Staff responsibilities when responding to an incident

If any adult in school is 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'), they must report it to the DSLs immediately. The DSLs will refer to DfE guidance: [Sharing nudes and semi-nudes: how to respond to an incident \(overview\) \(updated March 2024\) - GOV.UK \(www.gov.uk\)](#)

They 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 DSLs)
- Delete the imagery or ask the pupil to delete it

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- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

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

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

The DSL(s) 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 DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL(s) has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL(s), in consultation with the head 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.

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## Gateways School Allegations Against Staff

These procedures must be followed in any case in which it is alleged that a member of staff (including supply staff), governor, visiting professional or volunteer has met the harm test, this includes where an adult has:

- behaved in a way that has harmed a child or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates s/he may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes any behaviour that may have happened outside of school that might make the individual unsuitable to work with children. This is known as transferable risk.

All adults working in school have duty to disclose to the Head (or Chair of Governors where appropriate) where their relationships and associations both within and outside of the workplace (including online) may have implications for safeguarding children in school.

Examples of behaviours that would warrant an allegation or safeguarding concern by a member of staff could include:

- Physical, for example intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects or rough physical handling.
- Emotional, for example intimidation, belittling, scapegoating, sarcasm, lack of respect for children's rights, and attitudes which discriminate on the grounds of race, gender, sex, disability or sexuality.
- Sexual, for example sexualised behaviour towards pupils, grooming, sexual harassment, sexual assault and rape, sending inappropriate messages through social media and other technologies.
- Neglect which may include failing to act to protect a child or children, failing to seek medical attention or failure to carry out appropriate/proper risk assessment etc.

A safeguarding complaint that meets the above criteria must be reported to the Head ("case manager") immediately. Where a member of staff has low-level or niggling doubts, these should be referred to the Head. Any concern about the Head should be referred to the Chair of Governors. [From this point onwards in this section, the word "Head" refers to the Head or Chair of Governors in cases involving the Head.]

Where the Head determines that a safeguarding allegation does not meet the harm threshold in line with the criteria above they will refer the matter to be managed in line

with the Gateways Low-Level Concern Policy which can be found in Appendix K of this policy.

All staff must fully understand that any adult behaviours that deviate from the Guidance for Safer Working Practice, including inappropriate conduct outside of work are a concern, even if they are low-level. Low-level concerns are concerns that do not meet the harm test/allegations threshold. Examples of such behaviour include:

- Being over familiar 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; or
- Humiliating pupils

In more serious cases, allegations may be investigated under the formal disciplinary procedures and, where allegations are upheld, formal warnings issued as well as specific training and support. In cases where children/young people may be at further risk and/or evidence/witnesses may be compromised and/or the allegations are so serious that they may, if upheld, constitute gross misconduct, suspension of the member of staff/volunteer may be appropriate and should be considered in line with the school's Disciplinary Policy.

Any staff/volunteers who are dismissed by the school for gross misconduct or cumulative misconduct relating to safeguarding of children/young people will be referred to the appropriate professional body (e.g., TRA) and the DBS for consideration of barring. Similarly, where the school has a reasonable belief that the member of staff/volunteer would have been dismissed by the school had they been employed at the time of the conclusion of investigations, they will be referred to the DBS. The school will keep written records of all of the above.

Where a staff member feels unable to raise an issue with the Head or feels that their genuine concerns are not being addressed, staff can contact any of the Local Authority professionals named in Appendix A, in addition to other whistleblowing channels which may be open to them.

The Leeds City Council Whistleblowing Policy states that concerns can be raised by the following methods:

- Whistleblowing hotline 0113 3788008 (dedicated hotline answered by a member of the Internal Audit team or an answerphone).
- E-mail concerns@leeds.gov.uk
- In writing Internal Audit, 3rd Floor West, Civic Hall, Leeds, LS1 1JF

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

## APPENDIX A - Contact Details

(Copy displayed in staff room)

Gateways School

0113 2886345

|                       |                                      |                                                                                                                                                                                        |
|-----------------------|--------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| DSL)                  | Dr Tracy Johnson<br>Mrs Helen Wallis | <a href="mailto:tracy.johnson@gatewaysschool.co.uk">tracy.johnson@gatewaysschool.co.uk</a><br><a href="mailto:helen.wallis@gatewaysschool.co.uk">helen.wallis@gatewaysschool.co.uk</a> |
| DDSL                  | Mr Ralph Widdop                      | <a href="mailto:ralph.widdop@gatewaysschool.co.uk">ralph.widdop@gatewaysschool.co.uk</a>                                                                                               |
| Safeguarding Team     | Mrs Carol Bartle                     | <a href="mailto:carol.bartle@gatewaysschool.co.uk">carol.bartle@gatewaysschool.co.uk</a>                                                                                               |
| Safeguarding Team     | Mrs Diane White                      | <a href="mailto:diane.white@gatewaysschool.co.uk">diane.white@gatewaysschool.co.uk</a>                                                                                                 |
| Safeguarding Team     | Mrs Sarah Tiffany                    | <a href="mailto:sarah.tiffany@gatewaysschool.co.uk">sarah.tiffany@gatewaysschool.co.uk</a>                                                                                             |
| Safeguarding Team     | Mr Matthew Hayes                     | <a href="mailto:matthew.hayes@gatewaysschool.co.uk">matthew.hayes@gatewaysschool.co.uk</a>                                                                                             |
| Head                  | Dr Tracy Johnson                     | <a href="mailto:tracy.johnson@gatewaysschool.co.uk">tracy.johnson@gatewaysschool.co.uk</a>                                                                                             |
| Chair of Governors    | Mr Nick MacHugh                      | <a href="mailto:chair@gatewaysschool.co.uk">chair@gatewaysschool.co.uk</a>                                                                                                             |
| Safeguarding Governor | Miss Nicola Stephens                 | <a href="mailto:safegovernor@gatewaysschool.co.uk">safegovernor@gatewaysschool.co.uk</a>                                                                                               |

### Leeds Safeguarding Children Partnership (LSCP) - Education Team Contacts (Advice)

|                                                                                     |                                                                                |                                                                          |
|-------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|--------------------------------------------------------------------------|
| Web address:<br><a href="http://www.leedsscp.org.uk">www.leedsscp.org.uk</a>        | <a href="mailto:estconsultation@leeds.gov.uk">estconsultation@leeds.gov.uk</a> | 0113 3789685                                                             |
| Team Manager -<br>Education Safeguarding<br>Team Allegations<br>Manager - Education | Deborah Jobson                                                                 | 0113 3789475                                                             |
| Children Missing Out on<br>Education and Exclusion<br>Monitoring Lead               | Alison Finley                                                                  | 0113 3783385                                                             |
| Local Authority<br>Designated Officer                                               | Claire Ford<br>Jo Peake                                                        | 0113 3789687<br><a href="mailto:lado@leeds.gov.uk">lado@leeds.gov.uk</a> |

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### Child Protection Contacts (Referrals)

|                                                                 |                                                                                                                             |                                                                          |
|-----------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------|
| Request Service<br>Children's Social<br>Work Service -<br>Leeds | Duty and advice team                                                                                                        | Professionals - 0113 3760336                                             |
|                                                                 | Mon-Fri 8am-6pm                                                                                                             | Members of the public – 0113 2223301                                     |
|                                                                 | Emergency team                                                                                                              | 0113 535 0600                                                            |
|                                                                 | Out of hours                                                                                                                | <a href="mailto:childrensEDT@leeds.gov.uk">childrensEDT@leeds.gov.uk</a> |
| Other local<br>authorities                                      | North Yorkshire                                                                                                             | 01609 536993                                                             |
|                                                                 | Bradford                                                                                                                    | 01274 435600                                                             |
|                                                                 | York                                                                                                                        | 01904 551 900                                                            |
| Reporting child<br>abuse - local council<br>online tool         | <a href="https://www.gov.uk/report-child-abuse-to-local-council">https://www.gov.uk/report-child-abuse-to-local-council</a> |                                                                          |

### Disclosure Barring Service

|                   |                                                                 |               |
|-------------------|-----------------------------------------------------------------|---------------|
| Barring Referrals | DBS Barring, PO Box<br>3963, Royal Wootton<br>Bassett, SN4 4HH. | 03000 200 190 |
|-------------------|-----------------------------------------------------------------|---------------|

### FGM Contacts

|                      |                                                                                |
|----------------------|--------------------------------------------------------------------------------|
| Non-emergency Police | 101                                                                            |
| NSPCC FGM Helpline   | 0800 0283550<br><a href="mailto:fgmhelp@nspcc.org.uk">fgmhelp@nspcc.org.uk</a> |

### Forced Marriage Contacts

|             |                                                                     |
|-------------|---------------------------------------------------------------------|
| Advice line | 020 7008 0151<br><a href="mailto:fm@fcdo.gov.uk">fm@fcdo.gov.uk</a> |
|-------------|---------------------------------------------------------------------|

## Prevent Contacts

|                                                  |                                                                                                             |
|--------------------------------------------------|-------------------------------------------------------------------------------------------------------------|
| Non-emergency Police                             | 101                                                                                                         |
| Prevent Education Officer,<br>Leeds City Council | 0113 5350810<br><a href="mailto:prevent@leeds.gov.uk">prevent@leeds.gov.uk</a>                              |
| DfE helpline                                     | 020 7340 7264<br><a href="mailto:counter.extremism@education.gov.uk">counter.extremism@education.gov.uk</a> |

## Whistleblowing

|                                  |                                                                              |                                                                                  |
|----------------------------------|------------------------------------------------------------------------------|----------------------------------------------------------------------------------|
| Leeds City Council hotline       | Internal Audit, 3 <sup>rd</sup><br>Floor West, Civic<br>Hall, Leeds, LS1 1JF | 0113 3788008<br><a href="mailto:concerns@leeds.gov.uk">concerns@leeds.gov.uk</a> |
| NSPCC Whistleblowing<br>Helpline |                                                                              | 0800 0280285 <a href="http://help@NSPCC.org.uk">help@NSPCC.org.uk</a>            |

## Appendix B

### Part 1 Types of Abuse

**Abuse:** a form of maltreatment of a child. Somebody may abuse, neglect or exploit a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

It may fall into several categories as described below:

- **Neglect** – This 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 and clothing, shelter including exclusion from home or abandonment, failing to protect a child from physical and emotional harm or danger, failure to ensure adequate supervision including the use of inadequate caregivers, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.
- **Physical abuse** - This 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 symptoms of, or deliberately induces illness in a child.
- **Sexual abuse** - This 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. They may also include non-contact activities such as involving children in looking at, or in the production of sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet.) Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse as can other children. The sexual abuse of children by children is a specific issue in education (see section on **Allegations against other pupils** and **Appendix B Part 4**).
- **Emotional abuse** - This abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child’s emotional

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

**Bullying, domestic abuse and violence, child sexual exploitation, child criminal exploitation, radicalisation, female genital mutilation and forced marriage** are also forms of child abuse.

Part 2 Features which may indicate abuse

| NEGLECT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | PHYSICAL ABUSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Hunger<br/>Tiredness or listlessness<br/>Child dirty or unkempt<br/>Poorly or inappropriately clad for the weather<br/>Poor school attendance or often late for school<br/>Poor concentration<br/>Affection or attention seeking behaviour<br/>Untreated illnesses/injuries<br/>Pallid complexion<br/>Stealing or scavenging compulsively<br/>Failure to achieve developmental milestones, for example growth, weight<br/>Failure to develop intellectually or socially<br/>Neurotic behaviour</p> | <p>Patterns of bruising; inconsistent account of how bruising or injuries occurred<br/>Finger, hand or nail marks, black eyes<br/>Human bite marks<br/>Round burn marks, burns and scalds<br/>Lacerations, wealds<br/>Fractures, particularly spiral fractures<br/>Swelling and lack of normal use of limbs<br/>Unaccountable covering of limbs, even in hot weather<br/>Bald patches<br/>Symptoms of drug or alcohol intoxication or poisoning<br/>Untreated injuries<br/>Fear of going home or parents being contacted<br/>Fear of medical help<br/>Fear of changing for PE<br/>Inexplicable fear of adults or over-compliance<br/>Violence or aggression towards others including bullying<br/>Isolation from peers</p> |
| SEXUAL ABUSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | EMOTIONAL ABUSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <p>Sexually explicit play or behaviour or age-inappropriate knowledge<br/>Anal or vaginal discharge, soreness or scratching<br/>Reluctance to go home<br/>Inability to concentrate, tiredness<br/>Thrush, Persistent complaints of stomach disorders or pains<br/>Eating disorders, for example anorexia nervosa and bulimia<br/>Attention seeking behaviour, self-mutilation, substance abuse</p>                                                                                                    | <p>Over-reaction to mistakes, continual self-deprecation<br/>Delayed physical, mental, emotional development<br/>Sudden speech or sensory disorders<br/>Inappropriate emotional responses, fantasies<br/>Neurotic behaviour: rocking, banging head, regression, tics and twitches<br/>Self-harming, drug or solvent abuse<br/>Fear of parents being contacted<br/>Running away<br/>Compulsive stealing</p>                                                                                                                                                                                                                                                                                                                 |

Safeguarding & Child protection  
Policy and Procedures

|                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                    |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|
| Aggressive behaviour including sexual harassment or molestation<br>Unusually compliant<br>Regressive behaviour, Enuresis, soiling<br>Frequent or open masturbation, touching others inappropriately<br>Depression, withdrawal, isolation from peer group<br>Reluctance to undress for PE or swimming<br>Bruises, scratches in genital area<br>Exposure to, or engagement with, inappropriate sexual material | Masturbation, Appetite disorders - anorexia nervosa, bulimia<br>Soiling, smearing faeces, enuresis |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|

### Part 3 Other information on identifying abuse including disabled children and those with SEND

The following responses from parents may suggest a cause for concern across all four categories:

- An unexpected delay in seeking treatment that is obviously needed
- An unawareness or denial of any injury, pain or loss of function (for example, a fractured limb)
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development
- Reluctance to give information or failure to mention other known relevant injuries
- Frequent presentation of minor injuries
- Unrealistic expectations or constant complaints about the child
- Alcohol misuse or other drug/substance misuse
- Parents request removal of the child from home
- Violence between adults in the household

#### Disabled Children and those with Special Educational Needs

Children with special educational needs (SEN) and/or disabilities can face additional safeguarding challenges. Staff should be aware that additional barriers can exist when recognising abuse, neglect or exploitation in this group of children.

This can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with SEN and disabilities are at higher risk of peer group isolation;
- children with SEN and disabilities can be disproportionally impacted by things like bullying without outwardly showing any signs;
- communication barriers and difficulties in overcoming these barriers.

Additional possible indicators of abuse, neglect and / or exploitation, may also include:

- a bruise in a site that might not be of concern on an ambulant child such as the shin, might be of concern on a non-mobile child;
- not getting enough help with feeding leading to malnourishment;
- poor toileting arrangements;
- lack of stimulation;
- unjustified and/or excessive use of restraint;
- rough handling, extreme behaviour modification e.g. deprivation of liquid medication, food or clothing, disabling wheelchair batteries;
- unwillingness to try to learn a child's means of communication;
- ill-fitting equipment e.g., callipers, sleep boards, inappropriate splinting; misappropriation of a child's finances;
- invasive procedures.

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All staff have a role in preventing impairment of children's mental health/emotional wellbeing, including promoting positive mental health and identifying where students are struggling with their Mental Health. We regularly communicate messages to students regarding wellbeing and the promotion of positive mental health strategies through the curriculum, PSHCE and Form Time.

Concerns regarding a student's mental health/emotional wellbeing should be reported to a member of the school the safeguarding team in keeping with the school's safeguarding reporting arrangement so that students can be offered appropriate support, this may include local or national online services where appropriate. In addition, the school are able to make referrals to a wide range of external services to secure additional appropriate support for students.

## Part 4 Specific safeguarding issues

Annex B of Keeping Children Safe in Education contains important additional information about specific forms of abuse and safeguarding issues, the details are included here. These constitute safeguarding issues and staff should follow the procedures for notifying the Designated Safeguarding Lead.

### Honour based abuse (HBA)

So-called 'honour-based' abuse encompasses crimes which have been committed to protect or defend the 'honour' of the family and/or the community, it often involves a wider network of family or community pressure and can include multiple perpetrators. Includes Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBA are abuse (regardless of the motivation) and should be handled and dealt with as such. All staff should be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Any member of staff that has a concern should follow the normal safeguarding procedures, except in the case where FGM has taken place, teachers have a mandatory reporting duty (see following section).

### Female Genital Mutilation (FGM)

Female genital mutilation comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK (whether carried out in the UK or abroad on a UK citizen) and is a form of child abuse with long-lasting harmful consequences.

There are a number of factors in addition to a girl's community, country of origin and family history that could indicate she is at risk of being subjected to FGM (this is not an exhaustive list):

- a family member has undergone FGM;
- the father comes from a community known to practise FGM;
- the family indicate that there are strong levels of influence held by elders and/or elders are involved in bringing up female children;
- a woman/family believe FGM is integral to cultural or religious identity;
- a girl/family has limited level of integration within the UK community;
- a girl confides to a professional that she is to have a 'special procedure' or is to attend a special occasion to 'become a woman';
- a girl requests help because she is aware or suspects that she is at immediate risk of FGM;
- a long holiday to her country of origin or another country where the practice is prevalent;
- a girl is unexpectedly absent from school
- a girl talks about FGM in conversation;
- a girl from a practising community is withdrawn from PSHE.

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The following are indicators that FGM has been carried out (this is not an exhaustive list):

- asks for help but is not explicit about the problem;
- confides in a professional that FGM has taken place;
- a mother/family member discloses that female child has had FGM;
- difficulty walking, sitting or standing or looks uncomfortable;
- spends longer than normal in the bathroom or toilet due to difficulties urinating;
- long periods of time away from a classroom with bladder or menstrual problems;
- frequent urinary, menstrual or stomach problems;
- avoids physical exercise or requires to be excused from PE lessons without a GP's letter;
- increased emotional and psychological needs or significant change in behaviour;
- reluctant to undergo any medical examinations;
- talks about pain or discomfort between her legs.

If FGM appears to have been carried out on a girl under 18 then the teacher must personally report it to the police with the completion of the West Yorkshire reporting form (Appendix H). Under no circumstances should a member of staff examine a pupil. The teacher making the report should also inform the Designated Safeguarding Leads and children's social work services. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, staff should follow the normal child protection procedures, complete a cause for concern form and inform the Designated Safeguarding Lead. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).

### **Forced Marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

Potential risk factors may include:

- siblings forced to marry/early marriage;
- persistent absence;

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- request for extended leave of absence and failure to return from visits to country of origin;
- fear about forthcoming school holidays;
- being withdrawn from school by those with parental responsibility;
- sudden announcement of engagement to a stranger;
- prevented from going on to further/higher education.

If staff suspect a child has been involved in or about to be involved in a forced marriage, they should log it on CPOMS/complete a cause for concern form and inform the Designated Safeguarding Lead.

### **Child sexual exploitation (CSE)**

Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. It can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge. It can happen through the use of technology, for example, through others copying videos or images they have created and posted on social media.

Children may also be [groomed and exploited online](#). They may be persuaded, or forced, to:

- send or post sexually explicit images of themselves, this is referred to as sexting (more information can be found in **Appendix B Part 5**);
- take part in sexual activities via a webcam or smartphone;
- have sexual conversations by text or online.

Abusers may threaten to send images, video or copies of conversations to the young person's friends and family unless they take part in other sexual activity. Images or videos may continue to be shared long after the [sexual abuse](#) has stopped.

Young people who are being groomed or sexually exploited may:

- be involved in abusive relationships, intimidated and fearful of certain people or situations;
- hang out with groups of older people, or antisocial groups, or with other vulnerable peers;
- appear with unexplained gifts or new possessions;
- associate with other young people involved in exploitation;
- have older boyfriends or girlfriends;
- suffer from sexually transmitted infections or become pregnant;
- changes in emotional well-being;
- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late; and
- regularly miss school or education or do not take part in education.
- be very secretive, including about what they are doing online;
- go to unusual places to meet friends;

If staff suspect a child is being groomed or involved in CSE activities, they should log it on CPOMS/complete a cause for concern form and inform the Designated Safeguarding Lead. A flow chart showing the steps to take can be found in **Appendix E Part 3**. Further guidance is available at [Child sexual exploitation: guide for practitioners](#).

### Child criminal exploitation (CCE)

Individuals or groups takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity:

- in exchange for something the victim needs or wants;
- for the financial or other advantage of the perpetrator or facilitator;
- through violence or the threat of violence.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources. The victim may have been criminally exploited even if the activity appears consensual. Children cannot consent to their own abuse. CCE does not always involve physical contact; it can also occur through the use of technology. It can include children being forced to work in cannabis factories, forced to shoplift or pickpocket, or to threaten other young people. If they victim is coerced into moving drugs or money across the country this is referred to as **county lines** (see next section).

Potential risk indicators to help identify CCE:

- children who suffer from changes in emotional wellbeing;
- persistently going missing from school;
- children who go missing for periods of time without explanation or regularly come home late;
- children who are absent from education
- significant decline in educational attainment and attendance;
- children who associate with other young people involved in exploitation;
- increasing disruptive or aggressive behaviour;
- increasing drug and/or alcohol use;
- using sexual, drug-related or violent language;
- unexplained acquisition of money, clothes, mobile phones, unexplained gifts or new possessions;
- excessive receipt of texts/phone calls;
- relationships with controlling/older individuals or groups;
- suspicion of physical assault/unexplained injuries;
- parental concerns;
- carrying weapons.

## County Lines

County lines a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK. This is often from urban areas to suburban and rural areas, market and seaside towns using dedicated mobile phone lines or other form of 'deal line'. They are likely to exploit children and vulnerable adults to move and store the drugs and money, and they will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance. This type of movement of children falls under the legal definition of trafficking.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Potential risk indicators to help identify county lines:

- returning home late, staying out all night or going missing;
- being found in areas away from home;
- increasing drug use, or being found to have large amounts of drugs on them;
- being secretive about who they are talking to and where they are going;
- unexplained absences from school, college, training or work;
- unexplained money, phone(s), clothes or jewellery;

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- increasingly disruptive or aggressive behaviour;
- using sexual, drug-related or violent language you wouldn't expect them to know;
- coming home with injuries or looking particularly dishevelled;
- possessing hotel cards or keys to unknown places;
- persistently going missing from school or home and/or being found out of area;
- unexplained acquisition of money, clothes or mobile phones and/or having multiple handsets;
- excessive receipt of texts/phone calls;
- relationships with controlling/ older individuals or groups;
- leaving home/care without explanation;
- suspicion of physical assault/unexplained injuries;
- parental concerns;
- carrying weapons;
- significant decline in school results/performance;
- gang association or isolation from peers or social networks;
- self-harm or significant changes in emotional wellbeing;
- arrested for possession and intent to supply of significant quantities of drugs, particularly heroin and crack cocaine;
- arrested away from their own home area;
- arrested on public transport, particularly on trains.

## Serious violence

Young people can become involved with serious violence and staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crimes.

Potential risk indicators to help identify serious violence:

- increased absence from school;
- change in friendships with older individuals or groups;
- significant decline in performance;
- signs of self-harm;
- significant change in well-being;
- signs of assault or unexplained injuries.

## Domestic abuse

The cross-government definition of domestic violence and abuse is: *“any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to:*

*psychological; physical; sexual; financial; emotional; controlling behaviour and controlling behaviour."*

Domestic abuse is a form of abuse if it is directed towards the child, or the child is present when it occurs, or the child otherwise experiences it. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

[NSPCC- UK domestic-abuse signs symptoms effects](#)

[Refuge: What is domestic violence/effects of domestic violence on children](#)

[SafeLives: Young people and domestic abuse](#)

## Operation Encompass

Children living within the Leeds area who are present when domestic abuse occurs are covered by the Leeds Joint Agency Protocol for Domestic Violence and Abuse – School Notifications Procedures. The procedures provide better support to children affected by domestic violence and abuse. The Designated Safeguarding Leads will be confidentially notified of any incidents of domestic violence and abuse before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can give appropriate support. The Designated Safeguarding Leads will record all notifications on CPOMS. Further details are outlined in the Leeds City Council procedure [Leeds SCP Domestic Violence and Abuse Schools Notifications Protocol](#)

## Preventing radicalisation

Children are susceptible to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

Extremism goes beyond terrorism and is the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. Extremists often target the vulnerable, including the young, by seeking to sow divisions between communities on the basis of race, faith or denomination; justifying discrimination towards women and girls; seeking to persuade others that minorities are inferior; or arguing against the primacy of democracy and the rule of law in our society.

Radicalisation is the process by which people come to support terrorism and violent extremism and extremist ideologies associated with terrorist groups. The process of radicalisation is different for every individual and is a process, not a one-off event; it can take place over an extended period or within a very short time frame. It is important that staff are able to recognise possible signs and indicators of radicalisation.

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Examples of extremist causes that have used violence to achieve their goals include animal rights, the far right (UK) and international terrorist organisations such as Al Qaeda and Daesh.

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 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.

Although there is no single way of identifying radicalisation, children and young people can be drawn into violence or they can be exposed to the messages of extremist groups by many means. These can include family members or friends, direct contact with members of groups and organisations or, increasingly, through the internet, including through social media sites. This can put children and young people at risk of being drawn into criminal activity and has the potential to cause significant harm.

Potential indicators identified include:

- use of inappropriate language;
- possession of violent extremist literature;
- changes in behaviour, language, clothing or appearance;
- expression of extremist views;
- advocating violent actions and means;
- association with known extremists;
- seeking to recruit others to an extremist ideology.

Protecting children from risk of extremism and radicalisation is part of the school's safeguarding policy. Staff should be alert to changes in behaviour and report any concerns to the Designated Safeguarding Lead. If appropriate a cause for concern form should be completed. The school have appropriate network filters and monitoring systems in place to prevent terrorist and extremist material being accessed online. Vulnerable pupils or those being drawn into terrorism should be referred to the Channel programme (a multi-agency safeguarding programme to identify and support people at risk of radicalisation) via Leeds Local Authority. A flow chart showing the steps to take can be found in **Appendix E Part 2**.

Leeds has been designated a Prevent priority area and has therefore appointed a Prevent Coordinator for advice. Other parties who may be contacted for advice in these situations include the local police force, the non-emergency police number, the DfE helpline and [government](#) website (see **Appendix A** for contact details).

In line with [Prevent](#) statutory guidance, staff will ensure that any visiting speakers, who might fall within the scope of the Prevent duty, whether invited by staff or pupils, are appropriately supervised. Staff will, in line with regulation, also take action to ensure that each speaker is suitable. Presentations and/or speech content will be checked prior to the visit and staff will ensure that a balanced view is presented to pupils.

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from Gateways may be asked to attend the Channel panel to help with the assessment. An individual's engagement with the programme is entirely voluntary at all stages. Further information is available at [Channel guidance](#).

All staff should ensure they are aware of and respond to wider safeguarding issues outlined in KCSiE 2025 Annex B, this includes further information on:

- Child abduction and community safety incidents
- Children and the court system
- Children who are absent from education
- Children with family members in prison
- Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)
- County lines
- Modern Slavery and the National Referral Mechanism
- Cybercrime
- Domestic abuse
- Homelessness
- So-called 'honour-based' abuse (including Female Genital Mutilation and Forced Marriage)
- Preventing radicalisation (including the Prevent Duty and Channel)
- Child on child abuse
- Sexual violence and sexual harassment between children in schools and colleges (including Upskirting)
- Sexual violence and sexual harassment between children in schools and colleges (including Upskirting)

## Part 5 Information on sexually related concerns

At Gateways, we recognise that sexual violence and/or sexual harassment can happen anywhere including educational settings. Where concerns of sexual violence or sexual harassment are witnessed, disclosed or reported to the school (including those that have happened outside of school or online) the concern will be taken seriously.

## Sexting and Youth Produced Sexual Imagery

The relevant legislation is contained in the Protection of Children Act 1978 (England and Wales) as amended in the Sexual Offences Act 2003 (England and Wales).

Specifically it states:

- It is an offence to possess, distribute, show and make indecent images of children.
- The Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18.

Sexting is when someone sends or receives an indecent text, image or video. For most purposes, if imagery contains a naked young person, a topless girl, and/ or displays genitals or sex acts, including masturbation, then it will be considered indecent. Indecent images may also include overtly sexual images of young people in their underwear.

Pressuring someone into sending a nude picture can happen in any relationship and to anyone, whatever their age, gender or sexual preference. Putting pressure on someone to send a nude picture, or sharing someone's picture without their permission, even if it is a friend and they say it is just banter is wrong and [illegal](#). Being pressured into sending a nude picture is a form of abuse.

Making, possessing and distributing any imagery of someone under 18 which is 'indecent' is illegal. This includes imagery of yourself if you are under 18. It does not matter if they gave permission, someone else sent it to them, they have never met them before, they are under 18 too or it is a selfie. Anyone involved could be investigated by the police. If the person sending the image is over 18 and sending it to someone who is also over 18, this is not a crime. However, there may be other consequences of sending and sharing images.

Children under 13 are given extra protection from sexual abuse under the Sexual Offences Act 2003. This law makes it clear that sexual activity with a child under 13 is never acceptable, and that children of this age can never legally give consent to engage in sexual activity. Any situations involving children under 13 concerning the production of sexual imagery must be taken seriously as potentially being indicative of a wider safeguarding or child protection concern or as being problematic sexual behaviour.

Once a picture or video online or on your phone is shared the person sharing it loses control of it. Pictures can be quickly shared over the internet so once somebody else has it they can send it to anyone. In some situations, the person receiving the image may blackmail the person who sent it. If the person is lesbian, bisexual or gender questioning this could include threatening to 'out' them, or result in homophobic or biphobic bullying.

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Further information and advice on sexting can be found at the Child Exploitation Online Protection Centre (CEOP) <https://ceop.police.uk/>. Information is also available on the safer internet website: <https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>.

## Upskirting

Upskirting is a highly intrusive practice, which typically involves someone taking a picture under another person's clothing without their knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It can take place in a range of places. Anyone, and any gender, can be a victim and this behaviour is completely unacceptable. It is a criminal offence.

## Sexual violence and sexual harassment between children

[Keeping Children Safe in Education Part 5](#) and [Sexual violence and sexual harassment between children in schools and colleges](#) should be referred to for the legislative background.

Key information and definitions have been duplicated here.

Sexual violence and sexual harassment can occur between two children of **any** age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

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

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

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

Dismissing or tolerating such behaviours risks normalising them.

## *Sexual Violence*

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

### *Rape*

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

### *Assault by Penetration*

A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

### *Sexual Assault*

A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

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

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual 'jokes' or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - non-consensual sharing of sexual images and videos;
  - sexualised online bullying;
  - unwanted sexual comments and messages, including, on social media;
  - sexual exploitation, coercion and threats.

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. Nor should a victim ever be made to feel ashamed for making a report. Confidentiality should never be promised as it is very likely that it will be in the best interests of the child to seek advice and guidance from others. Parents will normally be informed, and a referral made to children's social services and /or the police, if necessary. A support plan will be put in place for the pupil.

## Appendix C – Dealing with a disclosure

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

- Stay calm.
- Do not transmit shock, anger or embarrassment.
- Reassure the child. Tell them you are pleased that they are speaking to you.
- Never enter into a pact of secrecy with the child. Assure them that you will try to help but let the child know that you will have to tell other people in order to do this. State who this will be and why.
- Tell them that you believe them. Children very rarely lie about abuse; but they may have tried to tell others and not been heard or believed.
- Tell the child that it is not their fault.
- Encourage the child to talk but do not ask "leading questions" or press for information.
- Listen and remember.
- Check that you have understood correctly what the child is trying to tell you.
- Praise the child for telling you. Communicate that they have a right to be safe and protected.
- Do not tell the child that what they experienced is dirty, naughty or bad.
- It is inappropriate to make any comments about other persons involved; if expressing empathy with the child, limit comments to the behaviour the child has allegedly experienced e.g. rather than saying "X is isn't very nice for doing that", say "thank you for telling me that, it mustn't have been very nice for you" instead.
- Be aware that the child may retract what they have told you. It is essential to record all you have heard.
- At the end of the conversation, tell the child again who you are going to tell and why that person or those people need to know.
- As soon as you can afterwards, make a detailed record of the conversation on a cause for concern form using the child's own language. Include any questions you may have asked. Do not add any opinions or interpretations.
- Do not investigate a disclosure as this could prejudice possible future legal action.

It is not staff's role to seek disclosures. Their role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk.

Immediately afterwards log it on CPOMS or complete a Cause for Concern Form and pass on the information to the DSL(s) so that it can be reported to Children's Social Work Service without delay.

Anyone can make a referral, if necessary. It is normal to seek parental consent prior to making a referral however this is not essential.

## Appendix D

### Part 1 – Cause for concern form

After completing the form, pass immediately to one of the Designated Safeguarding Leads.

|                                                                                                                                                                                                                                                                                                                                                                                                                                       |       |                     |        |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|---------------------|--------|
| Name of child:                                                                                                                                                                                                                                                                                                                                                                                                                        |       | Class /Tutor group: |        |
| Name of staff member completing form:                                                                                                                                                                                                                                                                                                                                                                                                 |       | Date completed:     |        |
|                                                                                                                                                                                                                                                                                                                                                                                                                                       |       | Time completed      |        |
| Completion details: (of observed behaviour*/discussion* /disclosure*) *delete as appropriate                                                                                                                                                                                                                                                                                                                                          |       |                     |        |
| Day:                                                                                                                                                                                                                                                                                                                                                                                                                                  | Date: | Time:               | Place: |
| <p>Record the details of the concern below. REMEMBER:</p> <ul style="list-style-type: none"><li>• Do not interpret what is seen or heard, simply record the facts.</li><li>• Record child's words verbatim.</li><li>• Describe concern/incident.</li><li>• Include who was involved, when it happened, nature of incident, relevant background information.</li><li>• Describe any behaviour or physical signs.</li></ul> <p>----</p> |       |                     |        |
| Signed:                                                                                                                                                                                                                                                                                                                                                                                                                               |       |                     |        |
| Form passed to:                                                                                                                                                                                                                                                                                                                                                                                                                       |       | Signed (DSL):       |        |

Part 2 – Cover sheet (DSL use only)

|                                                                                                          |                      |          |
|----------------------------------------------------------------------------------------------------------|----------------------|----------|
| Name of child:                                                                                           |                      |          |
| Class / Tutor Group                                                                                      |                      |          |
| Day:                                                                                                     | Date:                | Time:    |
| Received by:                                                                                             |                      |          |
|                                                                                                          |                      |          |
| Action taken                                                                                             | Discussion / Outcome | Initials |
| <b>Discussion with child</b><br>Ensure the child's wishes and feelings are ascertained where appropriate |                      |          |
| <b>Contact parents</b><br>Please tick<br>Telephone Call: ___<br>Meeting: ___                             |                      |          |
| Check behaviour database                                                                                 |                      |          |
| Check SEN Register                                                                                       |                      |          |
| <b>Refer to Social Care</b><br>Please indicate<br>YES / NO                                               |                      |          |
| <b>Other</b><br>(Please specify)                                                                         |                      |          |
| Monitoring sheet                                                                                         |                      |          |

Part 3 – Confidential Ongoing Monitoring Form (DSL use only)

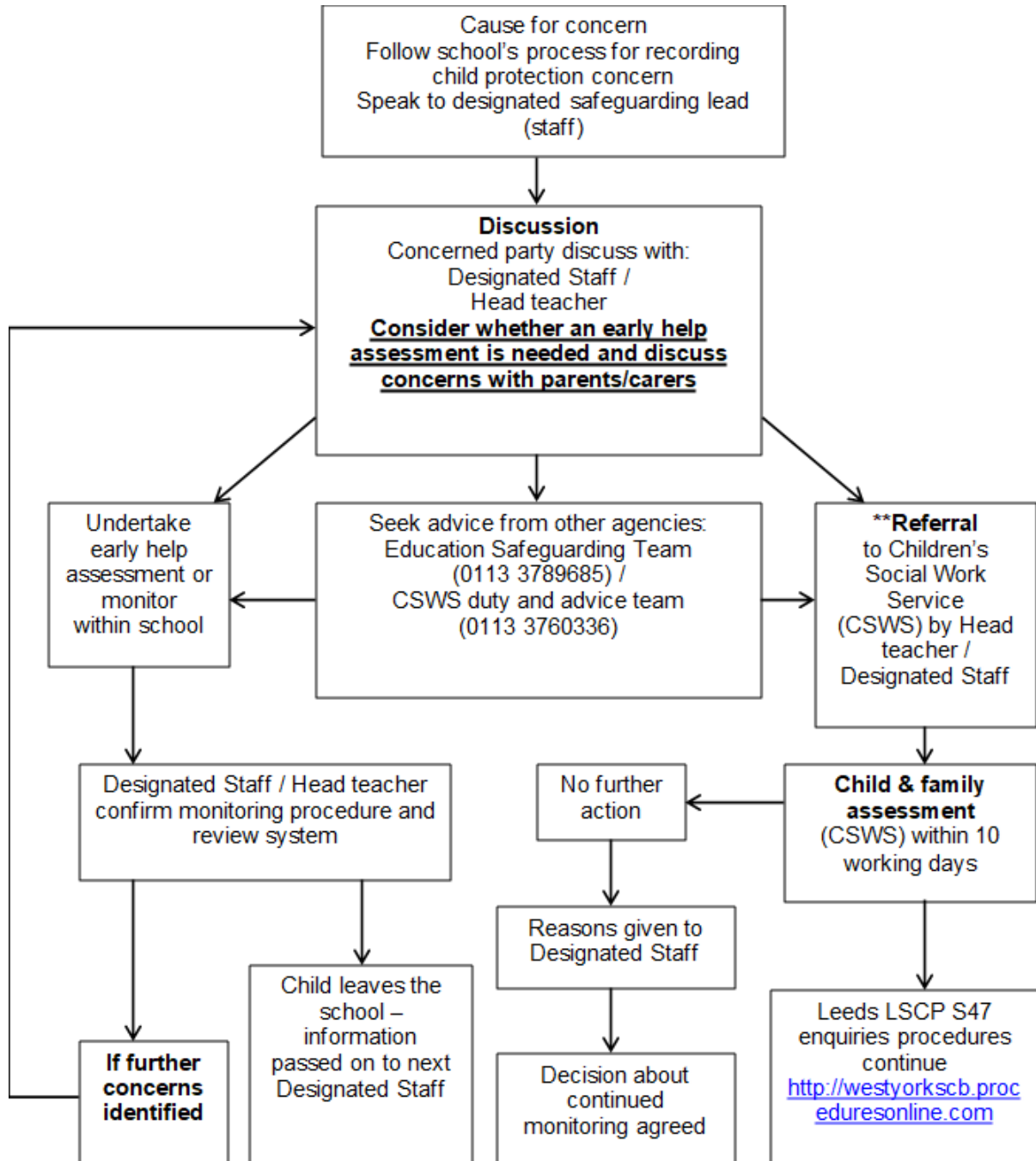
Name of child: .....  
Class / Tutor Group: .....  
Dat of birth: .....

| Day | Date | Concern/Incident | Action taken | Signature |
|-----|------|------------------|--------------|-----------|
|     |      |                  |              |           |

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## Appendix E – summaries of in school procedures

### Part 1 - Where there are concerns about a child



If unhappy about the outcome of the referral to Children's Services Social Care, please refer to the following:

- Leeds LSCP Local Protocol:  
<http://www.leeDSLscp.org.uk/LSCP/media/Images/pdfs/Concern-Resolution-final-v4-24-3-16.pdf>
- <http://westyorkscb.proceduresonline.com/>

**In cases which also involve an allegation of abuse against a staff member, see section in this document.**

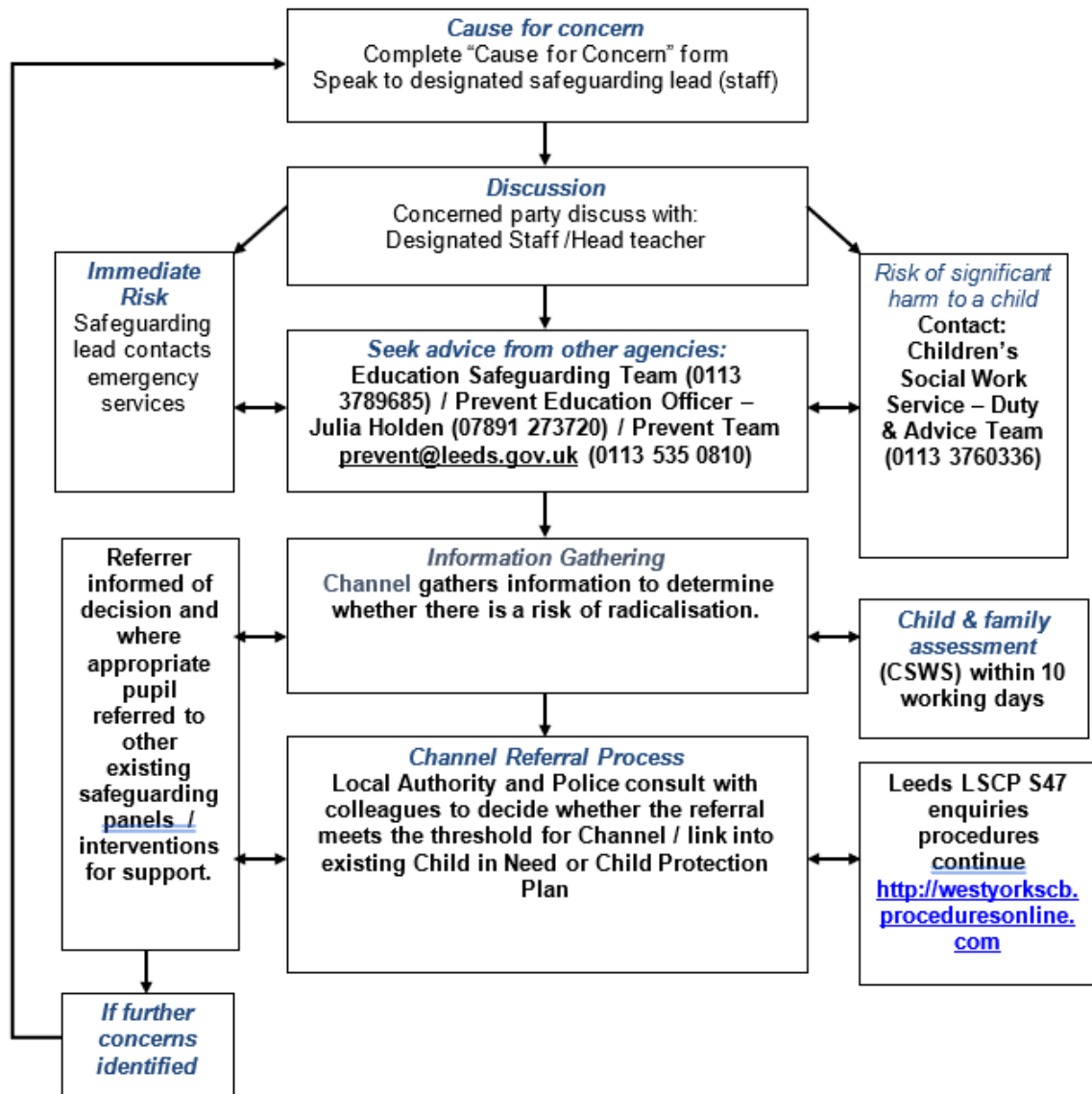
Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working together to safeguard children provides detailed guidance on the early help process.

Referrals should follow local authority referral process. Chapter one of Working together to safeguard children.

Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. This can include s17 assessments of children in need and s47 assessments of children at risk of significant harm. Full details are in Chapter one of Working together to safeguard children.

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

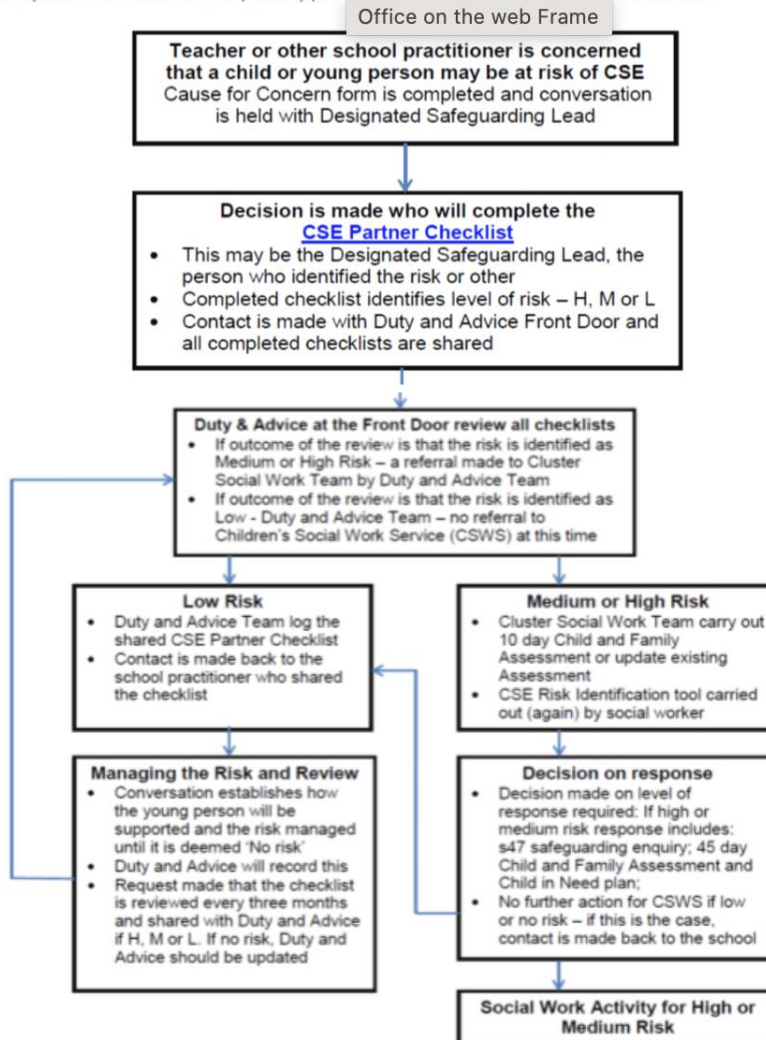
Part 2 - Where there are concerns about radicalisation of a child/member of staff



Part 3 – Where there are concerns about Child Sexual Exploitation (CSE)

**Responding to identified concerns about Child Sexual Exploitation (CSE) in schools**

Education professionals can also use the [WY Police CSE information report form](#) on the Leeds LSCB website to share any information which could help identify possible perpetrators of CSE, or children at risk of CSE.



## Appendix F

### Part 1 – Requesting Child Protection Records



Harewood, Leeds LS17 9LE  
Tel: 0113 288 6345 Fax: 0113 288 6148

Email: [tracy.johnson@gatewayschool.co.uk](mailto:tracy.johnson@gatewayschool.co.uk) (Y7-Y13)  
[helen.wallis@gatewayschool.co.uk](mailto:helen.wallis@gatewayschool.co.uk) (EYFS – Y6)

#### For the Attention of the Designated Safeguarding Lead

In accordance with the Education Child Protection procedures, you are required to pass on any protection records you may have on any pupils joining a new school.

Please complete this form and return it in a sealed envelope, marked **Strictly Confidential** to either Dr Tracy Johnson or Mrs Helen Wallis at the following address:

**Designated Safeguarding Lead, Gateways School, Harewood, Leeds, LS17 9LE**

Please also send any other relevant documentation via registered post.  
Any records sent will be kept confidentially in a locked cabinet.

Name of pupil:

Date of Birth:

Does this pupil have Child Protection documentation: **Yes/No\*** (delete as appropriate)

Signature: .....

Print name: .....

Email: .....

Date: .....

Position held: .....

School: .....

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Next review: August 2026 (or before if necessary)

Part 2 – Transferring Child Protection Records



Harewood, Leeds LS17 9LE  
Tel: 0113 288 6345 Fax: 0113 288 6148

Email: [tracy.johnson@gatewayschool.co.uk](mailto:tracy.johnson@gatewayschool.co.uk) (Y7-Y13)  
[helen.wallis@gatewayschool.co.uk](mailto:helen.wallis@gatewayschool.co.uk) (EYFS – Y6)

Please complete the relevant part and return in the enclosed envelope to either Dr Tracy Johnson or Mrs Helen Wallis at the following address:

**Designated Safeguarding Lead, Gateways School, Harewood, Leeds, LS17 9LE**

|                                                                          |                                                            |
|--------------------------------------------------------------------------|------------------------------------------------------------|
| Name of child:                                                           |                                                            |
| Date of birth :                                                          |                                                            |
| Name & address of receiving school/college:                              |                                                            |
| Date(s) of telephone discussion or meetings between DSLs:                |                                                            |
| Date file confidentially transferred to DSL in receiving school/college: | Please tick:<br><br>In person                      By Post |

To be completed by receiving school/college

|                                              |  |
|----------------------------------------------|--|
| Name of DSL at receiving school/college:     |  |
| Email address of DSL:                        |  |
| Name of person receiving the records:        |  |
| Date records received:                       |  |
| Designation of person receiving the records: |  |
| Date child on roll at new school/college:    |  |
| Signature of person receiving the records:   |  |

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Part 3 – HE Safeguarding Information Sharing Form

|                 |            |             |              |
|-----------------|------------|-------------|--------------|
| <b>Name</b>     |            |             |              |
| Date of Birth   |            |             |              |
| Gender Identity | Male       | Female      | Transgender  |
|                 | Non-Binary | Genderqueer | Gender-fluid |

|                                                                                                                                      |  |                          |  |                          |  |
|--------------------------------------------------------------------------------------------------------------------------------------|--|--------------------------|--|--------------------------|--|
| Please indicate the nature of the incident or safeguarding issue that you have been concerned about either in the past or currently? |  |                          |  |                          |  |
| Physical abuse                                                                                                                       |  | Sexual abuse             |  | Emotional abuse          |  |
| Neglect                                                                                                                              |  | Mental ill health        |  | Suicidal intent          |  |
| Exploitation                                                                                                                         |  | Forced marriage          |  | Risk to others           |  |
| Self-harm                                                                                                                            |  | CSE                      |  | Faith abuse              |  |
| Prevent                                                                                                                              |  | Domestic violence        |  | FGM                      |  |
| Financial abuse                                                                                                                      |  | Gangs and youth violence |  | Harmful sexual behaviour |  |
| Fabricated / induced illness                                                                                                         |  | Missing from home        |  | Sexting                  |  |
| Institutional abuse                                                                                                                  |  | Missing in education     |  | Substance abuse          |  |
| Trafficking                                                                                                                          |  | COVID-19 issues          |  | Looked after child       |  |
| Other information:                                                                                                                   |  |                          |  |                          |  |

|                                                                                                                                                                                                                                                                                         |      |                                             |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|---------------------------------------------|
| Are there any current or relevant historical safeguarding concerns?                                                                                                                                                                                                                     |      |                                             |
| Please can you provide details of the concerns that you have noted. Please also indicate if the concern was referred to any agencies (i.e. children's social work services, adult social care, police) and the outcome of the referral? Feel free to use additional sheets if required. |      |                                             |
| Safeguarding Issue                                                                                                                                                                                                                                                                      | Date | What action was taken / Referred to agency? |
|                                                                                                                                                                                                                                                                                         |      |                                             |
|                                                                                                                                                                                                                                                                                         |      |                                             |
|                                                                                                                                                                                                                                                                                         |      |                                             |

Safeguarding & Child protection  
Policy and Procedures

|                                                                                                                      |  |                          |  |
|----------------------------------------------------------------------------------------------------------------------|--|--------------------------|--|
| Please can you give full details including contact details of which agencies are currently working with the student? |  |                          |  |
| Children's Social Work Services                                                                                      |  | Adult Social Care        |  |
| Probation                                                                                                            |  | Youth Offending Services |  |
| CAMHS                                                                                                                |  | Police                   |  |
| Other: Please state                                                                                                  |  |                          |  |

|                                                                                                                                                                                                                                                                        |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Has the student been subject to a Child in Need Plan, a Child Protection Plan, Early Help Plan, Education Health Care Plan, Personal Education Plan or RAMP (for Harmful Sexual Behaviour) Please give further details about the support they are currently receiving. |
|                                                                                                                                                                                                                                                                        |

|                                                                                        |  |                                                                                                               |  |                |  |                           |
|----------------------------------------------------------------------------------------|--|---------------------------------------------------------------------------------------------------------------|--|----------------|--|---------------------------|
| What areas of support would you recommend the student will need at College?            |  |                                                                                                               |  |                |  |                           |
| Additional Learning Support                                                            |  | Life Skills                                                                                                   |  | Family support |  | Substance Misuse          |
| Risk of offending or re-offending                                                      |  | Financial *CLA are entitled to bursaries and discretionary funding.                                           |  | Health Advice  |  | Emotional Wellbeing       |
| Basic Skills                                                                           |  | Housing                                                                                                       |  | Counselling    |  | Other, please state below |
| Risk Management Plan                                                                   |  | (Please indicate if this is for risk to others, risk to themselves or relating to sexually harmful behaviour) |  |                |  |                           |
| Please can you provide further information concerning any recommendations for support? |  |                                                                                                               |  |                |  |                           |
|                                                                                        |  |                                                                                                               |  |                |  |                           |

|                                            |           |
|--------------------------------------------|-----------|
| Please can you provide your details below: |           |
| Name:                                      | Position: |
| Organisation:                              | Tel No:   |
| Email Address:                             | Date:     |

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## CONSENT TO SHARE INFORMATION PRIOR TO ENROLMENT

To be completed by student

I \_\_\_\_\_ (insert name) give my consent for the above information to be shared with \_\_\_\_\_ (insert name of provider).

|                      |  |
|----------------------|--|
| Date                 |  |
| Signature of student |  |

If consent from student has not been sought or you wish the HE provider to contact you directly for further information pertaining to this pupil, please provide a contact name and number of the relevant designated safeguarding lead.

|                  |  |
|------------------|--|
| Name of contact  |  |
| Telephone number |  |

## Appendix G

### Part 1 – Electronic Images and Communication Guidance Summary

#### Electronic Images

- Pupils in Prep, Upper 3, Lower 4, Upper 4, Lower 5 and Upper 5 are not allowed their phones during the school day.
- Pupils are not allowed to take and publish electronic images of other pupils or members of staff without the permission of the Head unless it is within the context of a supervised activity.
- Images which may result in actions for defamation, discrimination, breaches of copyright, data protection or other claim for damages must not be published. This includes but is not limited to material of an illegal, sexual or offensive nature that may bring the School into disrepute.
- Photos or video taken by phone must not be sent or used maliciously.
- Any images taken of pupils must be stored on the school network.
- Images taken on school visits should not be made freely available to pupils in a general way. Such images should instead be put into movie presentations, and shared with those who participated. An exception to this rule would be in fieldwork images used for coursework or class work.
- Photographs of pupils should never be stored on personally owned digital equipment.
- Images of pupils should only be used in publications and for display purposes in agreement with parents as in Gateways School's terms and conditions.
- Employees of the school should not use their own non school devices to record images of children under any circumstances.

It is accepted that school employees and pupils may need to have an electronic device with them in school to enable contacts outside normal school hours; however, their use should be of an appropriate nature for the sole purpose of their work. **If you have any evidence of pupils or staff using electronic devices or social networking sites inappropriately, please contact the safeguarding team.**

The following guidelines must be adhered to:

- No staff member should have a pupil, former pupil under the age of 18 or former pupil who has left the school within 3 years as a 'friend' to share information with;
- No member of staff should interact with any pupil in the school on other social networking accounts;

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- No member of the staff should request access to a pupil's area on social networking sites. Neither should they permit the pupil access to the staff members' area e.g. by accepting them as a friend;
- It is illegal for an adult to network, giving their age and status as a child;
- No pupil should attempt to join a staff member's personal area on networking sites. If pupils attempt to do this, the member of staff is to inform the Head. Parents will be informed if this happens;
- Employees and Pupils must not send inappropriate text messages or make nuisance calls to other members of the school community.

Breaches of this guidance:

- Child protection issues will be dealt with through the Safeguarding Policy and Procedures.
- Cyber bullying and internet abuse will be dealt with through the school's disciplinary procedures.

## Part 2 – EYFS guidance on the use of mobile phones and cameras

To ensure the safety and welfare of the children in our care, this policy outlines the protocols for the use of personal mobile phones and cameras in the setting.

- All electronic devices with imaging and sharing capabilities (including but not limited to: personal mobile phones, cameras and video recorders) **cannot** be used when in the presence of children either on school premises or when on outings. The only exception to this is if the mobile device (without a camera) is used for medical purposes (e.g. blood sugar monitoring).
- Any personal device that can take an image is not permitted in the workplace. If such a device is brought into the workplace it must remain in a locker. (This includes staff, visitors, parents, volunteers and students).
- No parent is permitted to use their mobile phone or use its camera facility whilst inside school buildings. School policy regarding this matter should be explained clearly to parents by the EYFS manager.
- Mobile phones **must not** be used in any teaching area within the setting or within the bathroom area.
- In the case of a personal emergency, staff should use the school telephone. It is the responsibility of all staff to make families aware of the school telephone numbers.
- Personal calls may be made in non-contact time but not within the teaching areas.
- Personal mobiles, cameras or video recorders should not be used to record classroom activities. Only school equipment should be used.
- Photographs and recordings can only be transferred to and stored on a school computer before printing.
- All telephone contact with parents/carers must be made on the school telephone and a written record is kept.
- During group outings, nominated staff will have access to the school mobile which can be used in an emergency or for contact purposes.
- In the case of school productions, parents/carers are permitted to take photographs of their own child in accordance with school protocols which strongly advise against the publication of any such photographs on social networking sites.

## Appendix H – FGM reporting form

West Yorkshire  
Police Headquarters  
PO Box 9  
Wakefield  
WF1 3QP

Phone 01924 293956  
Fax: 01924 293999  
[cib@westyorkshire.pnn.police.uk](mailto:cib@westyorkshire.pnn.police.uk)



### Female Genital Mutilation - Mandatory Reporting to Police

#### Pro-Forma for Use by Health, Teaching and Social Care Professionals

(Compliance with Section 5B of the Female Genital Mutilation Act 2003, as inserted by Section 74 of the Serious Crime Act 2015).

This pro-forma should be used by regulated professionals to comply with the requirements of the above legislation in order to report to West Yorkshire Police details of children who they discover to have been subject to female genital mutilation. When completed it should be e mailed to: [cib@westyorkshire.pnn.police.uk](mailto:cib@westyorkshire.pnn.police.uk)

Referring professionals will receive a return e mail quoting the police incident and crime report reference numbers.

\*For internal use only: Storm no.

Niche no.

|                                               |  |  |
|-----------------------------------------------|--|--|
| <b>Section 1 – About You</b>                  |  |  |
| Referrer's Name                               |  |  |
| Organisation                                  |  |  |
| Address                                       |  |  |
| Post                                          |  |  |
| Contact Telephone Number                      |  |  |
| E-mail Address                                |  |  |
| Role                                          |  |  |
| Preferred Means of contact                    |  |  |
| <b>Section 2 – About the Child and family</b> |  |  |
| Name of Child                                 |  |  |
| Date of birth                                 |  |  |
| Gender                                        |  |  |

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|                                    |  |  |
|------------------------------------|--|--|
| Address                            |  |  |
| Postcode                           |  |  |
| School (if applicable/<br>known)   |  |  |
| GP and surgery (if<br>known)       |  |  |
| Occupation (if<br>applicable)      |  |  |
| Parent/ Carer details              |  |  |
| Address if different to<br>child's |  |  |
| Contact Telephone<br>Number/s      |  |  |
| E-mail Address                     |  |  |
| Ethnic Origin                      |  |  |
| Nationality                        |  |  |

|                                                                                                                                                                             |  |  |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
| Details of other children<br>in the family (name/<br>Dob/ addresses if<br>different to above)                                                                               |  |  |
| Parent/ carer preferred<br>means of contact.                                                                                                                                |  |  |
| Please tell us if the child<br>or the parent/ carers<br>need an interpreter or<br>other support when we<br>contact them (and if so<br>what language/ type of<br>assistance) |  |  |
| <b>Section 3 – FGM Report</b>                                                                                                                                               |  |  |
| Where did it occur?                                                                                                                                                         |  |  |
| When did it occur?                                                                                                                                                          |  |  |
| Please provide<br>circumstances regarding<br>the discovery                                                                                                                  |  |  |

Please provide details of any action already taken and which other services or agencies are currently engaged with the child (e.g. social services). Please include names / contact details of any key workers if known.

Please submit your completed form to [cib@westyorkshire.pnn.police.uk](mailto:cib@westyorkshire.pnn.police.uk)

Appendix I – LADO Notification Form



Children's Services  
Integrated Safeguarding Unit  
Notification to Local Authority Designated Officer  
(Managing Allegations)

LADO Notification Form

ALLEGATIONS OR CONCERN ABOUT A PERSON WORKING WITH CHILDREN

This form has been designed to help all agencies working with children record and refer information when it has been alleged that a person who works with children has:

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

pose a risk of harm to children.

PLEASE PROVIDE AS MUCH INFORMATION AS YOU CAN AND SEND TO  
[LADO@leeds.gov.uk](mailto:LADO@leeds.gov.uk) WITHIN ONE WORKING DAY

N.B. THIS INFORMATION MAY BE SHARED WITH PARTNER AGENCIES.

|                           |  |
|---------------------------|--|
| Date of Notification:     |  |
| Date of Alleged Incident: |  |
| Name of Referrer:         |  |
| Agency:                   |  |
| Contact Details:          |  |

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Professional's Details :

| Name : | D.O.B : | Employment Sector: | Occupation: | Employer: |
|--------|---------|--------------------|-------------|-----------|
|        |         |                    |             |           |

Home Address:

Child/ren's Details (if applicable):

| Name : | D.O.B : | Legal Status i.e.<br>Looked after child<br>(S.31,S.20,LASP<br>O) | Social Worker<br>or<br>Case Worker: | Independent<br>Reviewing<br>Officer: |
|--------|---------|------------------------------------------------------------------|-------------------------------------|--------------------------------------|
|        |         |                                                                  |                                     |                                      |
|        |         |                                                                  |                                     |                                      |

Address:

Detail of Allegation:

**Referral Details** (to include name of referrer, date, time, detail of allegation and professional (s) involved)

Child or young person's view

**Has the young person's views been sought: Yes/No** (to include: when, by whom and detail of interview) If not please specify reason and date when young person will be seen

Parent or carer's view

**Has the parent/carer been notified and their views sought: Yes/No** (to include: when, by whom and detail of interview) If not please specify reason )

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Have you discussed this concern with the appropriate Line Manager and Human Resources within your organisation?

*What is their view*

Does the professional have children of their own? if known please give names & ages

Previous concerns  
of a safeguarding  
nature:

*Please identify (in chronological order) any previous/historical concerns of a safeguarding nature by the professional concerned.*

Does the professional work with children in any other capacity?

Does the professional acknowledge the concern?

Please consult with HR if advice is required about talking to the member of staff

*What is their view*

Do you believe that the individual concerned poses a current risk of significant harm to children and young people in your organisation?

*Please explain your rationale for both a Yes or No response.*

In your professional opinion what action should be taken in regard to the individual facing the allegation or concern?

If the professional who these concerns are about, is not a member of staff directly employed by your organisation (*i.e. an agency worker*). Have you discussed this concern with the appropriate Line Manager for the organisation concerned? (*If not, please contact the employer and complete the section below, prior to submitting this notification*)

What is their view

Name of employer:

Contact details:

#### LADO Discussion

Please provide relevant details:

Form Completed by:

Contact details:

Information entered on MOSAIC: YES / NO

Reviewed: Sept 2025

Next review: August 2026 (or before if necessary)

## Appendix J

### Part 1 - Role of the Safeguarding Governor

The Children's Act 2004 places a duty on agencies to ensure that their functions are discharged having regard for the need to safeguard children and promote their welfare.

Safeguarding and promoting welfare means:

- Protecting children from abuse, neglect and exploitation;
- Preventing impairment of the child's health or development;
- Ensuring children are growing up in circumstances consistent with the provision of safe and effective care;
- Creating opportunities to enable children to have optimum life changes in adulthood;
- As the governor responsible for safeguarding children, they will play an essential role in ensuring children in education are kept safe from harm.

It is recommended that the Safeguarding and Child Protection Governor should not be a parent governor or staff governor as this could lead to them being compromised in the event of a disciplinary matter.

Suggested duties:

- To be familiar with the safeguarding and child protection policy and associated issues, and to attend training for nominated safeguarding and child protection governors every three years, including online safety training;
- To ensure that the governing body puts in place a suitable safeguarding and child protection policy and associated procedures and that this is reviewed at least annually;
- To champion safeguarding and child protection issues within the school;
- To encourage other members of the governing body to develop their understanding of the governing body's responsibilities with regard to child protection and assist them to perform their functions in respect of safeguarding children;
- To contribute to ensuring any deficiencies in the school's safeguarding practices are addressed which may be brought to governors' attention by a member of school staff, a parent or from any other source;
- To meet regularly, at least a termly, with the DSLs on the school's leadership team in order to monitor the effectiveness of the safeguarding and child protection policy;
- To ensure that the governing body receives feedback, at least annually, on the implementation of the school's safeguarding and child protection policy and procedures.

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Next review: August 2026 (or before if necessary)

Arrangements for ensuring that the school's safeguarding and child protection policy is communicated to, and implemented by, all staff:

- Ensuring that the DSLs are part of the school's leadership team, and has sufficient time and resources at his /her disposal to carry out his / her duties effectively;
- Ensuring that a deputy DSL is identified;
- Ensuring that the DSLs and deputy DSL receive training every two years;
- Training in child protection is undertaken by all staff, including associate staff, admin staff and other ancillary staff, every three years and EYFS staff every two years;
- Arrangements are in place for the inclusion of safeguarding and child protection procedures in an induction programme for all people working in the school, no matter for how long, nor the status of that individual;
- Arrangements to ensure safer recruitment procedures and appropriate checks on staff and volunteers;
- Ensure the single central register is compliant;
- Receive information about the number of children currently subject to a Child Protection Plan (details of names will not be provided to maintain confidentiality);
- Ensure child protection files are kept securely and in one place;
- Ensure there is adequate and appropriate monitoring and tracking of vulnerable children;
- Monitor how safeguarding and child protection issues are addressed through the curriculum;
- Information is provided to LSCP about how the school's duties in respect of safeguarding and child protection have been discharged;
- The Chair of Governors will liaise with the Head and LSCP over matters regarding confidential child protection issues involving allegations against staff;
- Where there is an allegation of abuse against the Head, the Chair of Governors will take the lead in liaising with the LSCP and/or partner agencies unless a member of the governing body has relevant expertise which would mean that person was better fitted to take this role, including:
  - Notifying LSCP Authority Designated Officer (LADO) immediately;
  - Ensuring with LSCP support that appropriate action is to be taken in accordance with agreed procedures;
  - To attend initial and subsequent strategy meetings as required if other agencies are involved;
  - To take the lead in an investigation under employment procedures in conjunction with Human Resources and the Child Protection Service when the other agencies' involvement is at an end.

The Vice Chair of Governors will deputise for the chair in the chair's absence as appropriate.

Reviewed: Sept 2025

Next review: August 2026 (or before if necessary)



Part 2 – Staff Safeguarding Compliance Check – Safeguarding Governor use only

Auditor

.....  
Print name

.....  
Signature

.....  
Date:

To check understanding of their responsibilities as set out in KCSIE Part 1 and Annex B and Gateways Safeguarding and Child Protection Policy and Procedures selection staff and ask them any of the following questions. Enter Y or N to show understanding.

| Initials of staff member                                                                                         |  |  |  |  |  |
|------------------------------------------------------------------------------------------------------------------|--|--|--|--|--|
| Who is the Designated Safeguarding Lead?                                                                         |  |  |  |  |  |
| Who is the Deputy Designated Safeguarding Lead?                                                                  |  |  |  |  |  |
| What are the 4 main types of abuse?                                                                              |  |  |  |  |  |
| What should you do if you are concerned that a child may be at risk of harm?                                     |  |  |  |  |  |
| Who can make referrals to children's social services?                                                            |  |  |  |  |  |
| What should you do if you have concerns about another member of staff?                                           |  |  |  |  |  |
| What if that member of staff was the Head?                                                                       |  |  |  |  |  |
| Teachers only:<br>What must you do if you suspect FGM <b>has been carried out</b> on a girl under the age of 18? |  |  |  |  |  |
| What would you do if you suspect a pupil is being radicalised?                                                   |  |  |  |  |  |

Part 3 – Annual Checklist (Safeguarding Governor use only)

| Annual check of SCR (in hard copy)                                                                                                  | Completed | Notes |
|-------------------------------------------------------------------------------------------------------------------------------------|-----------|-------|
| Check SCR for gaps/anomalies                                                                                                        |           |       |
| Check SCR against staffing list                                                                                                     |           |       |
| Staff recruitment/personnel files                                                                                                   |           |       |
| Staff recruitment/personnel file to be selected at random                                                                           |           |       |
| Copy of job advertisement (mention of enhanced DBS checks, statement about safeguarding responsibilities)                           |           |       |
| Copy of job description (safeguarding responsibilities)                                                                             |           |       |
| Copy of person specification (safeguarding responsibilities)                                                                        |           |       |
| SIGNED copy of fully completed application form with no employment gaps                                                             |           |       |
| References from last TWO employers (from a school or college must be from headteacher/principal)                                    |           |       |
| Legal requirement to ask previous employer about any behaviour that might give cause for concern, including any disciplinary action |           |       |
| Legal requirement to ask previous employer about any allegations about behaviour towards children                                   |           |       |
| Staff recruitment/personnel files (cont.)                                                                                           |           |       |
| Prohibition from teaching check                                                                                                     |           |       |
| Barred list check                                                                                                                   |           |       |
| Enhanced DBS check                                                                                                                  |           |       |

Safeguarding & Child protection  
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|                                                 |  |  |
|-------------------------------------------------|--|--|
| DBS certificate (security features checked)     |  |  |
| Qualifications                                  |  |  |
| Right to work in UK                             |  |  |
| Overseas checks (if appropriate)                |  |  |
| Disqualification Regulations (EYFS)             |  |  |
| Prohibition from management (Section 128 check) |  |  |

PA to Head ..... Date .....

DSL ..... Date .....

Safeguarding Governor ..... Date .....

Copies submitted to Head/Chair of Governors ..... Date .....

Reviewed: Sept 2025  
Next review: August 2026 (or before if necessary)

## Appendix K – Low level concerns policy

### Introduction

Gateways School is committed to the safeguarding and health, safety and welfare of all of our pupils here at school, and this is of huge importance to all the adults who work within Gateways. Our pupils have the right to be safe, treated equally and be protected. Safeguarding is the responsibility of everyone in school, and all adults employed by the school should remain *professionally curious* to embed a culture of safeguarding.

This policy should be read in conjunction with the Safeguarding Policy, the Staff Code of Conduct and Whistle Blowing Policy. It is vital staff feel enabled to share their concerns, no matter how small about another member of staff's behaviour.

This policy has been written taking into account the work of Farrer & Co 'low-level concerns guidance' and KCSIE 2025.

This policy applies to all staff and other individuals (including volunteers) who work at school either directly with the students or contractors. This is a whole school policy, including EYFS.

### What are the aims of this policy?

- To ensure that staff are clear about the procedures for reporting concerning behaviour.
- To address unprofessional behaviour and support the individual to correct it at any early stage.
- To identify concerning, problematic or inappropriate behaviour, including any patterns that may need to be consulted on or referred to the local authority designated officer (LADO, on a no names basis if appropriate).
- Provide for responsive, sensitive and proportionate handling of such concerns when they are raised.
- Help identify any weak spots in the School's safeguarding system and help inform regular review of procedures.
- To create and embed a culture of trust, transparency and openness in which the clear values and expected behaviour which are set out in the Staff Code of Conduct are consistently lived, monitored and reinforced by all staff.

The Low-level Concerns Policy enables all staff to share any concerns, no matter how small, about their own or another member of staff's behaviour with the Head.

The term '*low-level concern*' does not mean that it is insignificant; it means that an adult's behaviour towards a child does not meet the harm threshold, but does raise a cause for concern.

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

### **What is a low-level concern?**

A low-level concern is when an adult's behaviour that does not meet the harm threshold, but is not consistent with the standards and values of Gateways and which falls below the expectations outlined in the school Staff Code of Conduct. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, through to that which is ultimately intended to enable abuse.

For example, this may include, but is not an exhaustive list:

- Being over-friendly with students
- Having favourites
- Taking photographs of students on a personal device
- Engaging in one-to-one activities with children where they cannot easily be seen
- Using inappropriate language
- Humiliating students

Low-level concerns can include inappropriate conduct inside and outside of work.

### **Who can raise a low-level concern?**

Low-level concerns can be raised by staff members, parents or a child. If anyone has a concern, they should raise it in the correct way, in a timely manner.

It is also important the correct process and procedures are followed, to deal with any issues raised, to help avoid any false allegations, or misconceptions around a behaviour.

### **Self-reporting**

A staff member may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally a member of staff may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the school's Staff Code of Conduct.

Staff are encouraged to self-report. It is self-protective and enables a potentially difficult issue to be addressed at the earliest opportunity.

It demonstrates awareness of the expected standards and self-awareness as to one's own actions, and how these might be perceived by others.

At Gateways we need to adhere to the highest standards, and a culture that allows this, self-reporting helps to strengthen this culture.

### **Self-reporting is a positive action**

All staff need to be informed about, and be able to identify concerning, problematic or inappropriate behaviour, and understand the importance of sharing concerns when they observe behaviour which goes against the School Code of Conduct. This is done by ensuring all staff read this policy, and attend relevant staff briefings, insets and any training as required.

The Low-level Concerns policy also acts as a monitor to gauge effectiveness of training and culture. At Gateways, staff are informed about identifying concerning, problematic or inappropriate behaviour, rather than think they can recognise dangerous people, they can be prepared to act when they observe behaviour which violates the Staff Code of Conduct.

Staff are also trained on specific behaviour to be aware of, and are encouraged and empowered to share any concerns about behaviour that is not appropriate. Intrinsic to this is, discussing during training real life examples of the consequences of failing to report.

It is important to note, if a member of staff has a concern, they do not have to establish if it is 'low-level' or not but to know the procedures in place in which to raise the concern in the first place.

Once staff share what they believe to be a low-level concern, that determination should be made by the Head. This can be done in consultation with the Designated Safeguarding Lead.

### **Staff Code of Conduct**

A robust Staff Code of Conduct is in place at Gateways which reflects and reinforces this policy. There is commitment from leadership to adhere to, enforce and reinforce the Staff Code of Conduct and its expectations, and to address any attempt to bypass policies or procedures – regardless of the person in question's status.

Staff are asked to read and sign the Staff Code of Conduct on an annual basis, so that everyone is familiar with it and clear on the standard of behaviour expected of them – it is a live document and applies to all levels of school.

### **How do I report a low-level concern?**

If a member of staff has a concern to raise, they should raise this directly with the Head or, in their absence, the Designated Safeguarding Leads or Deputy Designated Safeguarding Leads by completing the Low-level Concern Reporting Form. This form can also be accessed via the link below.

<https://forms.office.com/e/D1SPZfpfMz>

If the concern is about the Head, they should contact the Chair of Governors via the Director of Finance.

The Head will make a record of this to include:

- Details of the concern
- The context in which the concern arose
- Action taken

The name of the individual raising the concern should also be noted, but if they wish to remain anonymous, this should be respected as far as reasonably possible although in some circumstances, this may not be possible in the event of legal obligations.

Concerns cannot be raised anonymously i.e. an anonymous note, email or an incomplete electronic submission.

The Head will discuss the concern with the individual who raised it, and will take steps to investigate if needed.

The Head will respond sensitively and in a proportionate way to any concerns raised. They may discuss the concern with the Designated Safeguarding Lead. If there is any doubt whatsoever, the Head must seek advice from the LADO on a no names basis. In the first instance, the LADO will act on a consultation basis.

Low-level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified. Should supply staff or a contractor wish to self-report an incident, they may do so by writing a statement which should be sent to the Head. They may also request to see the Head or, in their absence, the Designated Safeguarding Lead.

Schools may receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (*e.g., Community groups, sports associations or service providers that run extra-curricular activities*). As with any safeguarding allegation, schools should follow their safeguarding policies and procedures, including informing the LADO

Most low-level concerns by their nature are likely to be minor and dealt with by guidance, training and support.

In most cases, a low-level concern will simply require a conversation with the individual about whom the concern was raised.

The Head will securely retain confidential files on low-level concerns. A central log of these will be monitored by the Head on a regular basis to ensure issues are being dealt with appropriately and promptly, and that potential patterns are identified.

It is important that concerns when raised will be dealt with promptly and effectively, whilst on the other hand protecting staff from potential false allegations or misunderstandings. Any investigation of low-level concerns will be dealt with discreetly on a need to know basis.

Where a pattern of behaviour is identified in respect to an individual, the Head will consider if there are wider cultural issues at play, and whether safeguarding and relevant policies need reviewing or that training needs to be arranged for staff to reduce the risk of the same issues occurring again.

### **How long are records kept for?**

Low-level concerns are kept for as long as is deemed relevant for Safeguarding purposes. In most cases once a staff member leaves the school, any concerns relating to them are retained for the duration of their personnel file and will not be included in any onward reference unless it meets the threshold for LADO referral (either as an individual concern or a group of concerns.)

### **Role of the Governors**

The Head will inform Governors about the implementation of the Low-level Concerns policy and the evidence of its effectiveness.

The Safeguarding Governor will also review an anonymised sample to ensure that concerns have been handled appropriately.

### Low-level Concerns Reporting Form

Please use this form to share a concern, even if this no more than a 'nagging doubt' that an adult may have acted in a way that is not consistent with the School's Staff Code of Conduct.

Please make your report concise, keeping it factual, and accurate. Please include:

- Details of the concern including, times, dates and other relevant information
- The context in which the concern arose
- Any following conversations, or action taken

Concern raised: is this a self-referral? Y/N

Name of staff member:

Role:

Detail of the Concern raised:

Your Name:

Date:

*This record will be held securely in accordance with the Low-level Concerns policy.*

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Next review: August 2026 (or before if necessary)

### Flow chart for reporting concerns

Concern relating to a child → Any concern a child is suffering harm or abuse or there is a specific safeguarding issue → Staff follow school Safeguarding policy → Notify Designated Safeguarding Leads or in their absence the Deputy Designated Safeguarding Lead

Low-level Concern → Any concern that an adult has acted in a manner that is contrary to the Staff Code of Conduct, or conduct that causes a sense of unease or a nagging doubt. This can be about another adult or a self-referral → Notify the Head

Allegation → Behaviour which indicates a member of staff has behaved in a way that has harmed a child or may have harmed a child, possibly committed a criminal offence against or related to a child, or behaved in a way towards a child or children that would indicate they pose a risk of harm to children → Notify the Head.

## Appendix L – EYFS Safeguarding Specific

### Safer Eating

Whilst children are eating there will always be a member of staff in the room with a valid paediatric first aid certificate.

Food will be prepared in a way to prevent choking. Children will be seated safely whilst eating and, where possible, in a designated eating area where distractions are minimised. Children will always be within sight or hearing of a member of staff whilst eating.

Where possible, staff will sit facing children whilst they eat to prevent choking, food being shared and to be aware of unexpected allergic reactions.

Choking incidents which require intervention will be recorded and parents/carers made aware. This record will be reviewed periodically to identify trends or common features.