



The Crypt School Safeguarding Policy

Lead Person: Deputy Head – Safeguarding, Inclusion and Wellbeing
Governing Body Committee: Pupil Welfare

The Crypt School fully recognises its responsibilities for Safeguarding and Child Protection.

The safety and wellbeing of all our pupils at The Crypt School is our highest priority. **Safeguarding and promoting the welfare of children is everyone's responsibility.** Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all staff at The Crypt School should ensure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child and maintain an attitude that "it could happen here".

No single member of staff can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.

We aim to know every pupil as an individual and to provide a secure and caring environment, so that everyone can learn in a safe and secure environment. We aim to build trusting relationships with students which facilitate open communication. In line with our values, we expect respect, good manners and integrity to be shown by everyone so that every student can develop to their full potential and feel positive about themselves as an individual. We understand that as a school we are in an important position to identify concerns early, provide help and prevent concerns from escalating. We recognise the importance of early help.

We recognise the expertise built up by staff working in the school and welcome suggestions from them with regards to this policy and our safeguarding arrangements. Feedback or suggestions should be directed to the Designated Safeguarding Lead (DSL) in the first instance.

This policy has been developed in accordance with the principles established by the Children Act 1989, and the School adheres to the Gloucestershire Safeguarding Children Partnership procedures and acts in line with the following:

- Keeping Children Safe in Education: information for all school and college staff - September 2025
- 'Working Together to Safeguard Children (DfE December 2023) - statutory guidance on inter-agency working to safeguard and promote the welfare of children
- 'Working together to improve school attendance' (DfE August 2024) - statutory guidance on maintaining high levels of school attendance
- 'What to do if you are worried a child is being abused' (HM Government March 2015)
- Gloucestershire Safeguarding Children Board guidelines
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (DfE March 2024)
- Searching, Screening and Confiscation Advice for schools (DfE July 2022)
- Generative AI: product safety expectations (DfE January 2025)

The Crypt School will fulfil its responsibility under section 11 of the Children Act 2004 and duties under the "Working Together" guidance to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our school to identify, assess and support those children who are suffering harm.

AIMS AND DEFINITION OF SAFEGUARDING

Safeguarding and promoting the welfare of children is defined as:

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

In this definition, the term 'children' includes everyone under the age of 18.

To this end, we will ensure that arrangements are in place for:

- All reasonable measures to be taken to minimise the risks of harm to children's welfare;
- All appropriate actions to be taken to address concerns about the welfare of a child, or children, working to agreed local policies and procedures in full partnership with other local agencies;
- All persons working at this school to be made aware of this Policy and other policies relevant to safeguarding duties, and to undertake regular and rigorous training.

The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. If

parents/ carers choose not to give consent for agencies to share information with School then School may not be able to fully meet the needs of their child.

Our policy applies to all staff, governors and volunteers working in the school ***in partnership with pupils and parents/carers***. There are **six** main elements to our policy:

1. We practise safe recruitment by checking the suitability of staff and volunteers to work with children. There will be at least one safer recruitment trained member of staff on each interview panel;
2. We train our staff, governors and volunteers in safeguarding issues and practice, and ensure that this training is regularly updated.
3. We educate our pupils about child protection issues and equip children with the skills needed to keep them safe – including online safety and safe internet use. We provide additional support as needed to SEND students in this regard;
4. We implement clear procedures for identifying and reporting cases, or suspected cases, of abuse. Allegations management procedures will be adhered to (see Statement of procedures for dealing with allegations of abuse against teachers, other staff and volunteers). Where a member of staff has behaved towards a child in a way that indicates they may pose a risk of harm to children this must be referred to the Headteacher. If this involves the Headteacher directly, this must be referred to the Chair of Governors;
5. We maintain a safe environment in which children can learn and develop. This includes any alternative provision site used. When an alternative provision site is used, the DSL will:
 - visit the site as well as gaining written confirmation from the alternative provider that appropriate staff safeguarding checks have been carried out, in line with Safer Recruitment, as well as written information about any arrangements that may put the child at risk
 - keep records of the address and phone number(s) of the alternative provider and any subcontracted provision or satellite sites the child may attend
 - regularly review any alternative provision placements to make sure the placement continues to be safe and meets the child's needs. If safeguarding concerns occur, the placement should be immediately reviewed and ended if necessary.
6. We are committed to inter-agency working and supporting early help for children with additional needs.

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:

- a) Have special educational needs (SEN) or disabilities;
- b) Are young carers;
- c) May experience discrimination due to their race, ethnicity, religion, gender identity or sexuality;
- d) Have English as an additional language;
- e) Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic abuse;
- f) Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation;
- g) Are asylum seekers;
- h) Are at risk due to either their own or a family member's mental health needs;
- i) Are looked after or previously looked after.

We recognise that these children can be targeted by other children, so the school provides a safe space for these children to speak out and share their concerns with members of staff.

Staff are familiar with the [Equality Act 2010 and the Public Sector Equality Duty](#) (PSED) and the Human Rights Act 1998 and how they apply to safeguarding.

Our school acknowledges the need to treat everyone equally, with fairness, dignity and respect.

Key Personnel

Gemma Hargraves is the Designated Safeguarding Lead (DSL). The DSL can be contacted on 01452 530291 or internal no. 203 or by email: ghargraves@crypt.gloucs.sch.uk. Gemma Hargraves is also the Designated Teacher for Looked After Children, Prevent Lead and Mental Health Lead. She has been fully trained for the demands of this role in child protection and inter-agency working. She is a member of the school's Senior Leadership Team and has the appropriate status and authority within the school to carry out the duties of the post. She is given the time, funding, training, resources and support to enable her to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and interagency meetings – and/or to support other staff to do so – and to contribute to the assessment of children.

Deputy Designated Safeguarding Leads:

Phil Stanlake (pstanlak@crypt.gloucs.sch.uk),
Steph Williams (swilliams@crypt.gloucs.sch.uk)
Hannah Attwood (hattwood@crypt.gloucs.sch.uk)
Susan Glock (sglock@crypt.gloucs.sch.uk)

Safeguarding Governor: Sheila Bradburn (via ndonlon@crypt.gloucs.sch.uk)

Chair of Governors: Lee Hill (via clerk@crypt.gloucs.sch.uk or lee.hill@cryptschool.org)

Whilst the activities of the DSL can be delegated to the Deputy DSLs, the ultimate lead responsibility for child protection remains with the DSL. The areas of responsibility for the DSL are set out in the Roles and Responsibilities section of this policy.

PART 1: POLICY

Aims

- The purpose of this policy is to provide all staff, volunteers and governors with the framework they need to keep children safe and secure in our school and to inform parents and guardians how we will safeguard their children while they are in our care
- This policy aims to ensure consistent outstanding practice across the school
- This policy aims to demonstrate our school's commitment with regard to safeguarding children

The role of our staff

Staff are particularly important as they are in a position to identify concerns early, provide help for children, and prevent concerns from escalating.

Staff have a responsibility to provide a safe environment in which children can learn.

Our school has a Designated Safeguarding Lead (DSL) who will provide support to staff members to carry out their safeguarding duties and who will liaise closely with other services such as children's social care. The DSL (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.

All staff should be prepared to identify children who may benefit from early help. 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.

Any of our staff members who have a concern about a child's welfare should follow the referral processes (see Actions required where there are concerns about a child flow chart later in policy).

What staff need to know

- a) Staff are made aware of the systems that support safeguarding; these are explained to them as part of their induction, including:
 - This Safeguarding Policy
 - Staff code of conduct
 - The role of the DSL (including the identity of the DSL and any deputies)
 - Keeping Children Safe in Education part 1, part 5 and annexe B

- Whistleblowing Policy
 - Procedure for dealing with allegations of abuse against staff, other staff or volunteers
 - The safeguarding response to children who go missing from education
 - What to do if they have a concern about a child
- b) All staff receive appropriate safeguarding and child protection training which is regularly updated. In addition, all staff receive safeguarding and child protection updates (for example, staff briefings and INSET training), as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- c) All staff are made aware of the early help process and understand their role in this.
- d) All staff are made aware of the process for making child protection referrals to social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role that they might be expected to play in such assessments.
- e) All staff know what to do if a child tells them they are being abused or neglected.
- f) Staff understand how to maintain an appropriate level of confidentiality. They understand that this means to involve only those who need to be involved, such as the DSL (or a deputy) and children's social care.
- g) Staff will never promise a child that they will not tell anyone about the allegation/disclosure that the child has made, as this may ultimately not be in the best interests of the child.

What staff should look out for

- a) Any child may benefit from early help, but our staff are particularly alert to the potential need for early help for a child who:
- Is disabled and has specific additional needs;
 - Has special education needs (whether or not they have a statutory education, health and care plan);
 - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
 - Is a young carer;
 - Is frequently absent/goes missing from care or home;
 - is at risk of modern slavery, trafficking or exploitation;
 - is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
 - has returned home to their family from care;
 - is showing early signs of abuse and/or neglect;
 - is at risk of being radicalised or exploited;
 - is a privately fostered child;
 - is misusing drugs or alcohol.

- b) All staff members are aware of the indicators of abuse and neglect so they are able to identify children who may be in need of help or protection.
- c) Staff members are advised to maintain an attitude at all times of “it could happen here” where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the best interests of the child.
- d) Knowing what to look for is vital to the early identification of abuse and neglect. If staff are unsure they should always speak to the DSL (or a deputy DSL).
- e) Children may not feel ready to, or know how to tell someone they are being abused, exploited or neglected, but this shouldn't stop staff from having a professional curiosity and speaking to the DSL.

What staff should do if they have concerns about a child

- a) If staff have any concerns about a child’s welfare, they should act on them immediately. See flow chart later in policy setting out the process staff should follow.
- b) Staff should adhere to this safeguarding policy and speak to the DSL (or deputy DSL). They should enter the concern on the My Concern online secure system.
- c) Options will then include:
 - Managing any support for the child internally via the school’s pastoral support processes;
 - An early help assessment;
 - A referral for statutory services, for example as the child might be in need, is in need, or suffering or likely to suffer harm.
- d) The DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, the DSL (or deputy DSL) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children’s social care. In these circumstances, any action taken should be shared with the DSL (or deputy) as soon as is practically possible.
- e) Our staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.
- f) Early help: If early help is appropriate, the DSL (or deputy DSL) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases should be kept under constant review and consideration given to a referral to children’s social care for assessment for statutory services, if the child’s situation does not appear to be improving or is getting worse.
- g) Statutory Assessments: Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children’s social care (and if appropriate the police) is made immediately.

- h) Female Genital Mutilation mandatory reporting duty for teachers: Whilst our staff should speak to the DSL (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.
- i) Record keeping: All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing using the electronic My Concern online system. If in doubt about recording requirements, staff should discuss with the DSL (or deputy).
- j) If after a referral the child's situation does not appear to be improving the DSL (or the person that made the referral) should press for re-consideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

What staff should do if a child is in danger or at risk of harm

If a child is in immediate danger or is at risk of harm a referral should be made to children's social care and/or the police immediately. Anyone can make a referral. Where referrals are not made by the DSL, the DSL must be informed as soon as possible that a referral has been made.

Safer recruitment

We will prevent people who pose risks to children from working in our school by ensuring that all individuals working in any capacity at our school have been subjected to safeguarding checks in line with KCSIE 2025. In addition to obtaining the DBS certificate, anyone who is appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching.

A check of any prohibition can be carried out using the Teacher Services' system that may be found here: <https://teacherservices.education.gov.uk/>

Prohibition orders are described in the National College for Teaching and Leadership's (NCTL) publication Teacher misconduct: the prohibition of teachers. It can be found here:

<https://www.gov.uk/government/publications/teacher-misconduct-the-prohibition-of-teachers--3>

We will ensure that agencies and third parties supplying staff provide us evidence that they have made the appropriate level of safeguarding checks on individuals working in our school. The single central record covers the following people: all staff, including teacher trainees on salaried routes, agency and third-party and supply staff who work at the school. The Single Central Record is held by Sharon Bailey (HR Support) on behalf of the Senior Leadership Team. New staff are required to join the DBS update service and the HR Support conducts checks via this service.

Every job description and person specification, and job advertisement will have a clear statement about the safeguarding responsibilities of the post holder. The school website will echo this within our 'work for us' section. Candidates are informed that the school should carry out an online search on shortlisted candidates to help identify any issues that are publicly available online.

We will ensure that at least one member of every interview panel has completed safer recruitment training within the last 2 years.

We have a procedure in place to manage allegations against members of staff, supply staff and volunteers (and to respond to low level concerns). We will communicate with Local Authority Designated Officer (LADO), through consultations and referrals when needed.

Supply teachers – we will consider all allegations against an individual not directly employed by, where disciplinary procedures do not fully apply, (for example, supply teachers provided by an employment agency) and ensure allegations are dealt with properly and communication with supply agency and LADO is continued throughout the investigation.

There is an agreed staff code of conduct which is compliant with ‘Safer Working Practices’, and includes acceptable use of technologies, staff/pupil relationships, low level concerns, and communications, including the use of social media.

For agency and third-party supply staff, schools and colleges must also include whether written confirmation has been received that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, and the date that confirmation was received and whether any enhanced DBS certificate check has been provided in respect of the member of staff.

What staff should do if they have concerns about another staff member

Low Level Concern Reporting

All schools are required to keep records of low level concerns raised about members of staff, including supply staff, volunteers and contractors. The term ‘low level’ does not mean that it is insignificant. A low level concern is any concern - no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the code of conduct (including inappropriate conduct outside of work) but the concern does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO. If unsure as to whether the information meets the harm threshold the DSL or Headmaster will contact the LADO for advice.

Examples of low level concerns might include:

- Being over friendly with children
- Having favourites
- Taking photographs of children on a personal mobile phone
- Choosing to engage with a child on a one-one basis in a secluded area
- Using inappropriate sexualised, intimidating or offensive language
- Humiliating pupils

Low level concerns about a member of staff should be reported to the DSL or Headmaster. If the concern is initially raised with the DSL she will inform the Headmaster in a timely fashion. All low

level concerns and actions taken will be recorded in writing, using a standard proforma (see appendix 1). If the individual sharing the concern wishes to remain anonymous on the written record that will be respected as far as possible. If the concern has been raised via a third party, the Headmaster (or nominated deputy) should collect as much evidence as possible by speaking directly to the person who raised the concern (unless raised anonymously) and to the individual involved and any witnesses. If the concerns relate to supply staff or contractors, the Headmaster should notify their employers.

Records will be stored securely and reviewed regularly so that potential patterns of concerning behaviour can be identified. It is recommended in KCSIE that records are retained at least until the individual leaves the school.

KCSIE is clear that low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example misconduct or poor performance; a low level concern which relates exclusively to safeguarding will not be referred to in a reference.

Sharing low level concerns is an important part of our whole school approach to safeguarding. We aim to embed a culture of openness, trust and transparency and ensure that the values and expected behaviour set out in the Staff Code of Conduct are constantly lived, monitored and reinforced by all staff.

Allegations against staff

If a staff member has significant concerns about the conduct of another staff member then this must be referred to the Headmaster immediately. Where there are concerns about the Headmaster this should be referred to the Chair of Governors. Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

All staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.

A child or young person may make an allegation against a member of staff, including supply staff and volunteers. If such an allegation is made, the member of staff receiving the allegation will immediately inform the Headteacher and follow our Procedure for Allegations against teachers, other staff and volunteers.

Allegations may be received relating to an incident that happened when an individual or organisation was using school premises for the purposes of running activities for children (for example community groups, sports associations or service providers that run extra-curricular activities). As with any safeguarding allegation, safeguarding policies and procedures should be followed, including informing the LADO.

What staff should do if they have concerns about safeguarding practices within the school

All staff should feel able to raise concerns about poor or unsafe practice and potential failures in the safeguarding regime and that such concerns will be taken seriously by our school's senior leadership team.

Appropriate whistleblowing procedures, which are suitably reflected in staff training and staff code of conduct policies, are in place for such concerns to be raised. See the Whistleblowing Policy.

Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them, as detailed in the Whistleblowing Policy. Staff can also call the NSPCC dedicated helpline on 0800 028 0285 as an alternative route if they feel unable to raise concerns regarding child protection failures internally.

Roles and responsibilities

The Governing Board

Whilst the Governors have appointed the DSL as the senior member of staff from the school's Leadership Team to take lead responsibility for safeguarding and child protection, the Governing Body retains a strategic leadership responsibility for the school's arrangements.

Sheila Bradburn is the Safeguarding Governor. She is responsible for liaising with the Head and DSL over all matters regarding safeguarding and child protection issues. The role is strategic rather than operational. The Safeguarding Governor receives enhanced safeguarding training relevant to the governance role. All Governors receive training at induction, annually online and read the required sections of KCSIE. They are also aware of their obligations under the Human Rights Act 1998 and Equality Act 2010.

The Governing Board will undertake a regular review of safeguarding and the related policies and procedures that operate in school.

The Governors ensure that:

- there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare;
- the school's safeguarding arrangements take into account the procedures and practice of the Gloucestershire Safeguarding Children Partnership, including understanding and reflecting local protocols for assessment and the referral threshold document; and
- the school contributes to inter-agency working, including providing a co-ordinated offer of early help when additional needs of children are identified and support to children subject to child protection plans.

The Governors have appointed the DSL as the senior member of staff from the school's Leadership Team to take lead responsibility for day-to-day safeguarding and child protection, including oversight of filtering and monitoring.

The Headmaster will ensure that:

- a) These safeguarding policy and procedures are implemented and followed by all staff in our school;
- b) Sufficient time and resources are allocated to enable the DSL and deputy to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings;
- c) All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the Procedure for dealing with allegations against teachers, other staff and volunteers;
- d) Child safety and welfare is addressed through the curriculum.

The role of the DSL

The areas of responsibility for the DSL are set out below (taken from KCSIE Annex C):

Manage referrals

The DSL is expected to:

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

Work with others

The DSL is expected to:

- act as a point of contact with the three safeguarding partners (police; health; local authority);
- liaise with the Headmaster to inform him of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations (this should include being aware of the requirement for children to have an Appropriate Adult present - PACE Code C)
- work with the Headmaster and relevant strategic leads, taking responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children are experiencing, or have experienced and identifying the impact these issues might be having on children's attendance, engagement and achievement; or as required, liaise with the "case manager" (as per Part Four of KCSIE) and the LADO at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff (especially pastoral support staff, school first aiders, IT Technicians, SENDCo) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that a child's needs are considered holistically; - take lead responsibility for Filtering and Monitoring

- act as a source of support, advice and expertise for all staff and ensure that staff are supported through the referrals processes and that staff are supported to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support;
- ensure the school knows who of its cohort have or have had a social worker and maintain a culture of high aspirations amongst them, alongside supporting teaching staff to provide additional academic support or reasonable adjustments to help them reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact of children's educational outcomes;
- promote supportive engagement with parents/ carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.

Training

The DSL (and deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The DSL should undertake Prevent awareness training.

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

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so; o understand the importance of the role the DSL has in providing information and support to children in social care to safeguard and promote the welfare of children;
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- are alert to the specific needs of children in need, those with special educational needs, those with relevant health conditions and young carers;
- understand the importance of information sharing, both within the school and with the three safeguarding partners, other agencies, organisations and practitioners;
- understand and support the school with regards to the requirements of the Prevent duty and can provide advice and support to staff on protecting children from the risk of radicalisation;
- can understand the unique risks associated with online safety and be confident they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school;
- can recognise the additional risks that children with SEND face online, for example, from online bullying, grooming, radicalisation and generative AI and are confident they have the capability to support SEND children to stay safe online;

- obtain access to resources and attend any relevant or refresher training courses;
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

Raise Awareness

The DSL should:

- ensure each member of staff has access to, and understands, the school's child protection policy and procedures, especially new and part time staff;
- ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the governing body regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this; - link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements;
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with school leadership staff.

Information sharing, record keeping and managing the child protection file

The DSL is responsible for ensuring the files are kept up to date. Records should include: a clear and comprehensive summary of the concern; details of how the concern was followed up and resolved; a note of any action taken, decisions reached and the outcome.

Access to child protection records is restricted to the DSL, her deputies and the Headmaster. The DSL reviews records regularly so that any concerning patterns of behaviour can be spotted. Records are kept for at least the period during which the child is attending the school, and beyond that in line with current data legislation and guidance.

Where children leave the school, the DSL should ensure their child protection file is transferred to the new school or college as soon as possible and within 5 days for an in-year transfer or within 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. If sending by post, pupil records will be sent by "Special/Recorded Delivery"; if sent electronically, records will be password protected. For audit purposes, a note of all pupil records transferred or received should 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. Receiving schools and colleges should ensure key staff such as DSLs and SENDCo or the named person are aware as required. The DSL will request confirmation of receipt from the new school. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

Availability

During term time, the DSL or a Deputy DSL is always available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst generally the DSL is available in person, she may both be absent from school on occasion; in this case, staff are able to discuss any concerns with any Deputy DSL and, in addition to this, the DSL would be available via mobile phone and/or email.

During out of hours/out of term school activities, a member of the Senior Leadership Team is always contactable via mobile phone in case of emergencies and either the DSL or a Deputy DSL would be contactable via mobile phone and/or email for safeguarding concerns.

Safeguarding@crypt.gloucs.sch.uk should be used during school holidays and is accessed by the DSL and Deputy DSLs. If neither the DSL nor Deputy DSL is contactable, then any member of the Senior Leadership Team would act upon any safeguarding concerns in accordance with this policy. All staff are given guidance about referring matters directly to children's social care where necessary.

Deputy DSLs

Deputy DSLs must be appropriately trained and in the absence of the DSL carry out those functions necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL a named deputy will assume all of the functions above.

All staff:

All staff will follow the Gloucestershire Safeguarding Children Board Procedures/ Local Authority guidance in all cases of abuse, or suspected abuse.

All staff will therefore:

- a) Implement and follow this policy;
- b) Understand that the responsibility to safeguard children requires that all staff appropriately share any concerns they may have about children;
- c) Support the child's development in ways that will foster security, confidence and resilience;
- d) Provide an environment in which children and young people feel safe, secure, valued and respected, and feel confident and know how to approach adults if they are in difficulties;
- e) Provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure they contribute to assessments of need and support plans for those children where appropriate;
- f) Ensure that detailed and accurate records of concerns about a child are entered on My Concern online even if there is no need to make an immediate referral.
- g) Attend the Friday morning Staff and HoY briefing (or read the briefing note if away) to maintain awareness of the most vulnerable children and any emerging safeguarding issues locally and nationally.
- h) Inform the DSL if they become aware that a child accessed or attempted to access harmful or inappropriate content online, including through use of generative AI.

Supporting Children

Staff must recognise that a child who is abused, who witnesses violence or who lives in a violent or abusive environment may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth.

Staff must accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

The Crypt School acknowledges the important role that the curriculum can play in the prevention of abuse and in the preparation of our pupils for the responsibilities of adult life and citizenship. As appropriate, the curriculum will be used to build resilience, emotional literacy and self-esteem, help students to keep safe and to know how to ask for help if their safety is threatened. We prepare all of our pupils to make reasoned, informed choices, judgments and decisions. Time is allocated in the Personal Development programme (which incorporates Relationships, Health and Sex Education), assemblies and Tutor time for discussion of safeguarding and child abuse in an age-appropriate way, in order to help pupils develop the confidence to recognise abuse and stay safe. Relevant issues are also addressed through other areas of the curriculum, for example, in Biology, Computing, English and History.

Our school will support all children and young people by:

- a) Encouraging the development of self-esteem and resilience in every aspect of life;
- b) Promoting a caring, safe, happy and positive environment;
- c) Liaising and working together with all other support services and those agencies involved in the safeguarding of children;
- d) Carrying out no name consultations with the Professional Advice Line where appropriate;
- e) Carrying out Early Help Assessments (EHA) where appropriate to identify what support can be put in place for the child and family;
- f) Notifying Social Care as soon as there is a significant concern;
- g) Notifying Social Care when a child/young person attending any school setting is privately fostered;
- h) Providing continuing support to a pupil (about whom there have been concerns) who leaves the school by ensuring that such concerns and school medical records are forwarded under confidential cover to the Designated Person/DSL at the pupil's new school immediately.

All pupils know that there are adults to whom they can turn if they are worried, including their Form Tutors, Pastoral Support Workers, Heads of Year, the Head of Sixth Form, the Deputy Head (Safeguarding, Inclusion and Wellbeing), school-based Counsellors and School Nurse.

Confidentiality

All staff recognise that all matters relating to child protection are confidential. The DSL will disclose personal information about a child or young person to other members of staff on a need-to-know

basis only. However, all staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children. All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing or that of another.

Staff will always undertake to share an intention to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt, staff will consult with the Professional Advice Line or Multi-Agency Safeguarding Hub (MASH) on this point.

Staff will take no-names consultations with our Local Assessment and MASH teams to discuss any concerns, but understand that if asked by any of these teams for a name, the name will be disclosed and it will become a referral.

Supporting Staff

Staff who have encountered a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting. Our school will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support. This could be provided by another trusted colleague (for example Mental Health First Aiders are available for all staff to talk to), Occupational Health, and/or a representative of a professional body or trade union, as appropriate.

Our school recognises that the DSL and Deputy DSLs should have access to support and appropriate workshops, courses or meetings as organised by the local authority or other certified training provider.

The DSL, Pastoral Support Workers and Heads of Year have access to professional supervision due to the nature of their roles.

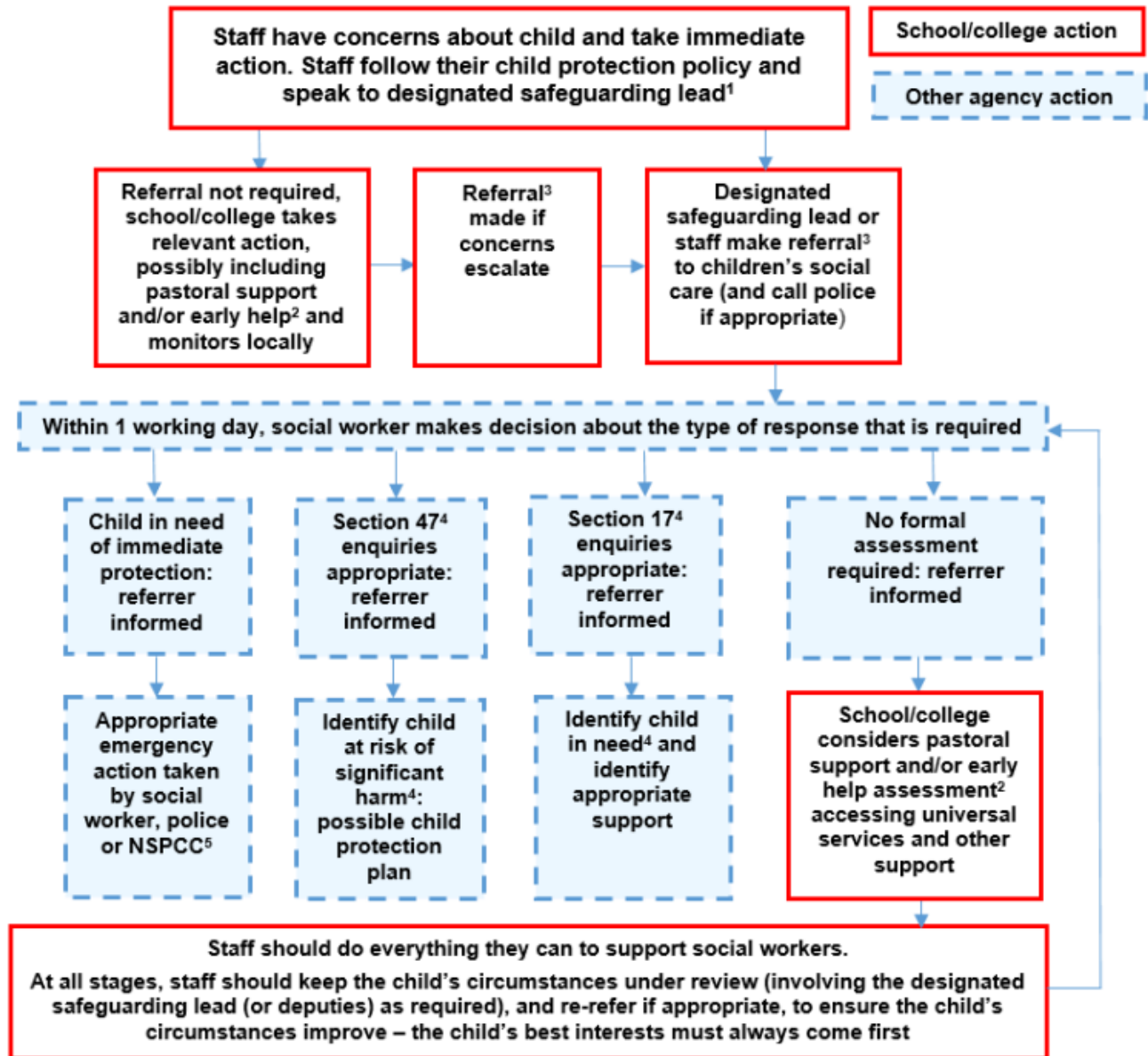
VISITORS AND VOLUNTEERS

The school takes all practicable steps to ensure that school premises are as secure as circumstances permit. All visitors are asked to read a summary of our safeguarding procedures as they sign in at Reception. This invites them to request a meeting with the DSL if they have any concerns about the welfare of a pupil during their visit.

The school actively encourages the use of visiting speakers to enrich the experiences of pupils and staff and to stimulate debate. However, staff must ensure that visiting speakers are suitable and appropriately supervised when in school or delivering an online talk. In addition, any messages communicated to pupils by visiting speakers must be consistent with the ethos and values of the school, and must not marginalise any communities, groups or individuals or seek to radicalise pupils through extreme or narrow views of faith, religion or culture or other ideologies.

Members of the Crypt School Parents Teachers Association, who visit during school hours, must sign in with Reception. They should wear a visitor lanyard plus a PA badge showing their name. These badges will be stored in Reception. These visits will usually be arranged in advance to ensure an appropriate member of staff is on hand to help and supervise.

Actions where there are concerns about a child (from KCSIE 2025)



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

2 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. Working Together to Safeguard Children provides detailed guidance on the early help process.

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

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

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

PART 2: RESPONDING TO CONCERNS ABOUT A CHILD

Children may not feel ready or know how to disclose to someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Children may feel embarrassed, humiliated, or they may be being threatened. Staff must maintain their professional curiosity and share any concerns or observations with the DSL or her deputy.

Listening to children - dealing with a disclosure of abuse

Children making a disclosure may do so with difficulty, having chosen carefully to whom they will speak. They may come to talk to you without actually saying much. They may seem distant or hesitant and may start by talking about something small, something easier to talk about. It may be that it takes a number of conversations before they are willing to disclose. Always remind students they are in a safe space and support is available if they need to talk about anything else. Any pupil may speak to any member of staff of their choice. It is important that the member of staff sets boundaries firmly at the outset of such a conversation, making it clear that no one can offer absolute confidentiality. If the pupil is only prepared to speak if absolute confidentiality is guaranteed, a report should be made to the DSL following the procedure set out below.

If a pupil makes a disclosure about abuse, staff should:

- Stay calm
- Not communicate shock, anger or embarrassment
- Reassure the child. Tell them you are pleased that they are speaking to you and that they will be taken seriously. The child should never be given the impression that they are creating a problem by disclosing or that it is their fault
- 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
- Remember that children very rarely lie about abuse; they may have tried to tell others and not been heard or believed
- 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
- Not tell the child that what they have experienced is dirty, naughty or bad/ or suggest they should feel ashamed for making such a report
- Not make any comments or judgements about the alleged offender

- Be aware that the child may retract what they have told you. It is essential to record in writing, all you have heard, though not necessarily at the time of disclosure
- 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 using the child's own language. Include any questions you may have asked. Do not add any opinions or interpretations
- If the disclosure relates to a physical injury do not photograph the injury, but record in writing as much detail as possible.

Staff should never:

- Ask leading questions
- Promise a child absolute confidentiality
- Ask the child to write down their account
- Investigate with, or without, others
- Take photographs of marks
- Attempt any medical judgement
- Arrange a medical examination
- Ask a child to remove any clothing
- Tape/video record an interview

It is not the education 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:

You must not deal with this yourself. If a disclosure of abuse is made, if a member of staff has reason to believe abuse has occurred, if a child is at risk of suffering significant harm, or if a child is in danger, the member of staff must report it immediately in accordance with the procedures set out in this Policy.

If the disclosure involves a member of staff, contractor, volunteer, visitor or Governor, follow the procedures set out for dealing with allegations against staff. If it does not involve any of these people, a referral should be made to children's social care (and, if appropriate, the police) immediately. It will usually be the DSL or her deputy who makes the referral. However, anyone can make a referral. Where referrals are not made by the DSL, the DSL should be informed, as soon as possible, and will then take the lead in managing external agencies and liaising with other staff as appropriate. Any reports of abuse involving a child with SEND will require close liaison with the SENDCo.

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing, usually through an entry to My Concern. All staff must be aware of the high level of confidentiality of written records and individual staff members should pass all notes, signed and dated, to the DSL. The DSL and her deputy should be alerted to any child protection information added to MyConcern.

Making a referral

Referrals for children living in Gloucestershire will be triaged by the Families First (or sometimes referred to as MASH: multi agency support hub). Referrals will also be made to Contact Swindon, First Response (Bristol) and South Gloucestershire Children's Partnership as required.

Confirmation of the referral, and details of the decision as to what course of action will be taken, should be received from the local authority within one working day. If this is not received, the DSL (or the person who made the referral) should contact children's social care again.

If, after a referral, the pupil's situation does not appear to be improving, the DSL (or the person who made the referral) should press for reconsideration to ensure their concerns are addressed and that the pupil's situation improves.

Where relevant, the school will co-operate with the Channel panel and the police in providing any relevant information so that each can effectively carry out its functions to determine whether an individual is vulnerable to being drawn into terrorism. The school will respond to requests for information from the police promptly.

Note: If the child in question lives outside the areas mentioned, then the appropriate LSCB or LSCP should be consulted and their procedures followed. The online tool: *Report Child Abuse to Your Local Council* allows you to search for the appropriate contact using a child's postcode.

Review

Any child protection incidents at the school will be followed by a review of our safeguarding procedures and a prompt report to the Governors. Where an incident involves a member of staff, the LADO Team will be asked to assist in this review to determine whether any improvements can be made to the school's procedures.

The DSL will ensure that this Policy is reviewed annually, and its procedures and implementation are updated and reviewed regularly, working with the Governors as necessary. The DSL will update the Leadership Team regularly on the operation of the school's safeguarding arrangements. The Governing Body will undertake an annual review of this Policy and the school's safeguarding procedures.

The DSL maintains close links with DSLs at other local schools and meets regularly with the Safeguarding Governor to ensure the highest standards are maintained.

Links to other policies:

- Statement of Procedure for Dealing with Allegations of Abuse Against Staff
- Anti-Bullying Policy
- Behaviour Policy
- Equal Opportunities Policy

- Pupil Restraint Policy
- Recruitment, Selection and Disclosure Policy and Procedure
- Whistleblowing Policy

Reviewed: August 2025

Approved by Full Board of Trustees: (scheduled for October 2025)

Review Cycle: 1 year

Date of next review: July 2026

Appendix 1

SUPPORTING INFORMATION

Definitions of abuse

All school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children (child on child abuse).

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may

also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

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

Specific safeguarding issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Annual safeguarding courses and regular updates in briefings are designed to keep staff abreast of the ever-changing picture of safeguarding. Some particular safeguarding issues are covered below. Annex B of KCSIE contains important additional information about other specific forms of abuse and safeguarding issues, such as child abduction, county lines and modern slavery, and provides useful links to more detailed guidance.

Contextual safeguarding: safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the DSL (and deputies) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors, so it is important that schools provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

Child on Child Abuse

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

- bullying (including cyberbullying), prejudice-based and discriminatory bullying;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- abuse in intimate personal relationships between peers;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- Upskirting or down-blousing, which typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission, 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 is a criminal offence. Anyone, of any gender, can be a victim;
- consensual and non-consensual sharing of nudes and semi-nudes images and or videos (also known as youth produced sexual imagery), including sending or requesting such images, and
- initiation/hazing type violence and rituals.

All staff should be clear as to the school's policy and procedures with regards to child on child abuse and remain aware that child on child abuse often includes an online element which facilitates, threatens and or encourages.

Disclosures of child on child abuse or suspected child on child abuse should be dealt with as any other safeguarding concern and action taken immediately.

Sexual violence and sexual harassment between children

It is important that school staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. It can occur also through a group of children sexually assaulting or sexually harassing a single child or group of children. Staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be

perpetrated by boys. Children with special educational needs and disabilities are also three times more likely to be abused than their peers.

Any suspected case of child on child sexual violence or sexual harassment must be reported immediately to the DSL who will handle it in accordance with Part Five of KCSIE. All students are aware of how to report incidences of such behaviour and regular treatment of the topic features in the Personal Development curriculum and in year group assemblies. The school has its own dedicated action plan for tackling sexual harassment, violence and misogyny and any incidents are recorded on MyConcern.

The victim may ask the school not to tell anyone about the sexual violence or sexual harassment. The following information from paragraph 473 and 474 of KCSIE provides guidance if this is the case: *There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies. For example, the public task basis may apply, where the overall purpose is to perform a public interest task or exercise official authority, and the task or authority has a clear basis in law.*

Advice should be sought from the designated safeguarding lead (or a deputy), who should consider the following:

- parents or carers should normally be informed (unless this would put the victim at greater risk)
- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and
- rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

Ultimately, the designated safeguarding lead (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other children.

Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside school. 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 or displaying pictures, photos or drawings of a sexual nature;
- online sexual harassment, including consensual and non-consensual sharing of nudes and semi-nudes images and or videos (taking and sharing nude photographs of under 18s is a criminal offence);
- sharing of unwanted explicit content;
- Upskirting/ down-blousing;

- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media; -sexual exploitation; coercion and threats

Sexual violence

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.

What is consent?

Consent is about having the freedom and capacity to choose. The age of consent is 16 (a child under 13 can never consent to any sexual activity). 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.

The school prioritises its role in preventative education and preparing pupils for life in modern Britain. There is a culture of zero tolerance to sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by the school's behaviour policy, pastoral support system and a planned programme of RSHE delivered regularly, tackling issues such as: boundaries; consent; body confidence; stereotyping; and sexual harassment in Personal Development lessons.

Harmful sexual behaviour

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). The term has been widely adopted in child

protection and is used in this advice. HSB can occur online and/or face-to-face and can also occur simultaneously.

Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive - but children still need to know it is illegal- whilst non-consensual is illegal and abusive. When considering HSB, both ages and the stages of development of the children are critical factors.

Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. Confidential specialist support and advice on HSB is available from the specialist sexual violence sector and sources are listed in Annex B of KCSIE.

Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

If you are made aware of an incident involving sharing nude or semi-nude images (also known as 'youth produced sexual imagery'), you must report it to the DSL immediately.

When dealing with cases involving the sharing of nudes and semi-nudes (sexting), we give due regard to the DfE guidance *Searching, screening and confiscation* and to the guidance document *Sharing nudes and semi-nudes: how to respond to an incident*. All staff are aware that they should not view or forward illegal images of a child.

Pupils are taught about the dangers of image sharing, pornography and healthy relationships in Personal Development (PSHE).

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

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males, females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation, as well as being physical, can be facilitated by and/or take place online.

Online safety

The use of technology has become a significant component of many safeguarding issues and should not be seen as a separate topic. Time online is part of the everyday lived experience of all members of the school community. It is also important to acknowledge that many young people see very little distinction between their life on and offline and that whilst technology is beneficial to so many aspects of day to day life it can provide a platform that facilitates harm.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- content: being exposed to illegal, inappropriate or harmful material including disinformation, misinformation and conspiracy theories.
- contact: being subjected to harmful online interaction with other users
- conduct: personal online behaviour that increases the likelihood of, or causes, harm
- commerce: risks such as online gambling, inappropriate advertising, phishing and financial scams

Pupils increasingly work online, and we recognise that it is crucial to safeguard pupils from potentially harmful and inappropriate online material. As such appropriate filters and monitoring systems are in place, and appropriate teaching around online safety is also delivered. The school aligns itself with KCSIE 2024 which states: 'filtering and monitoring standards should be reviewed and discussed with IT staff and service providers with a view to planning what more needs to be done to meet the standard'. We have a whole school approach to online safety, doing all we can to minimise the risk of children's exposure to harmful material through the school's IT system. As part of this we ensure that we have appropriate filtering and active monitoring systems in place (Surf Protect and Securus).

The school will:

- a) identify and assign roles and responsibilities to manage filtering and monitoring systems. This will be agreed and reviewed in a regular meeting between the DSL and the Network manager
- b) review filtering and monitoring provision at least annually.
- c) block harmful and inappropriate content without unreasonably impacting teaching and learning.
- d) have effective monitoring strategies in place that meet their safeguarding needs.
- e) Deliver online safety training (which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction.

It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with in line with this policy and, where appropriate, referrals should still be made to children's social care and as required, the police.

Our school will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children 5-11-year olds and 12-17 year olds. They explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Private Fostering

A private fostering arrangement is essentially one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or close relative with the intention that it should last for 28 days or more. If we think a child in the educational setting is being privately fostered, the Designated person will make a referral to the Children and Families Helpdesk – 01452 426565. Social care will undertake an assessment of the private fostering arrangement which will include safeguard checks on the carers and contacting the child's parents. A worker will be allocated until the child is 16 and the arrangement will be monitored and reviewed and the young person visited on a regular basis. The GSCB runs workshops on private fostering explaining the legislation and the roles and responsibilities of parents, carers, and the agencies involved.

Children who are absent from education for prolonged periods and/or repeated occasions

All staff should be aware that children who are absent, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, 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. Staff should be aware of their school or college's unauthorised absence and children absent from education procedures.

Elective Home Education (EHE)

Where School becomes aware that a parent is considering home schooling the DSL/ Deputy DSL will endeavour to arrange a meeting with parents and any other key professionals working with the child, ideally before a final decision is made. It is vital that parents/ carers consider what is in the

best interests of the child. The pastoral team will also meet with the child individually to discuss their wishes and feelings in advance of meeting with parents/ carers. School will seek advice from the Gloucestershire Safeguarding Children Partnership to ensure the decision making is rigorous and relevant safeguards are put in place. Where a child has an Education, Health and Care Plan, local authorities will also need to review the plan, working closely with parents or carers.

Child Criminal Exploitation: County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

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 Domestic Abuse Act 2021 received Royal Assent in April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse ensures that different types of relationships are captured, including ex-partners and family members.

Operation Encompass

Operation Encompass works to ensure that schools are informed in a timely fashion when Police have been called to incidents of domestic abuse, thus ensuring that children can be provided with appropriate support during their time in school. The Crypt School receives notifications from Gloucestershire Police only. The DSL has completed training in the Operation Encompass system and will manage reports and communicate information to colleagues as appropriate.

So-called ‘honour-based’ violence (including Forced Marriage)

So-called ‘honour-based’ violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the DSL.

Female Genital Mutilation FGM

All teachers are subject to a mandatory reporting requirement in respect of FGM. When a teacher discovers that an act of FGM appears to have been carried out on a girl aged under 18, that teacher has a statutory duty to personally report it to the police. The teacher should also discuss the matter with the DSL.

If a teacher at the School has reasons to suspect that an act of FGM has been carried out or is going to be carried out, s/he must discuss the situation with the DSL, who will follow the school's normal safeguarding procedures and will consult children's social care as appropriate.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable
- spending longer than normal in the bathroom or toilet due to difficulties urinating
- spending long periods of time away from a classroom during the day with bladder or menstrual problems
- frequent urinary, menstrual or stomach problems
- prolonged or repeated absences from school, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations
- confiding in a professional without being explicit about the problem due to embarrassment or fear
- talking about pain or discomfort between her legs

Forced Marriage (FM)

FM is now a specific offence under s121 of the Anti-Social Behaviour, Crime and Policing Act 2014 that came into force on 16 June 2014. A FM is a marriage conducted without the valid consent of one or both parties, and where duress is a factor. Forced marriage is when someone faces physical pressure to marry (e.g. threats, physical violence or sexual violence) or emotional and psychological pressure (e.g. if someone is made to feel like they're bringing shame on their family). This is very different to an arranged marriage where both parties give consent. FM is illegal in England and Wales. This includes:

- taking someone overseas to force them to marry (whether or not the forced marriage takes place);
- marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not).

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

Some warning signs that forced marriage may be about to take place, or may have already taken place are:

- signs of anxiety, stress or depression
- emotional withdrawal
- low self-esteem
- self-harming
- sudden decline in performance, motivation and aspirations
- frequently absenting themselves from lessons
- conflict with parents about further education choices and destinations.

Staff should speak to the Designated Safeguarding Lead if they have any concerns. Further information and guidance for schools can be found in the government document *Multi-agency statutory guidance for dealing with forced marriage*:

Multi-agency statutory guidance for dealing with forced marriage and multi-agency practice guidelines: Handling cases of forced marriage (accessible version) - GOV.UK (www.gov.uk)

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and antisocial behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or carers, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances.

Mental Health

The Deputy Head (Safeguarding, Inclusion and Wellbeing) / (DSL) is the School Mental Health Lead.

All staff should be aware that 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. Only appropriately, trained professionals should attempt to make a diagnosis of a mental health problem so any concerns should be referred to appropriate agencies via the designated safeguarding lead. Staff, however, are well placed to observe and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one and immediate action should be taken, following the school's safeguarding policy.

It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour and education. If staff have a non-immediate mental health concern about a child they should speak to the relevant Head of Year (HoY) and record on My Concern. The HoY will then lead on an action plan and provide appropriate support. Staff should contact the DSL, without delay, if a child is at risk of immediate harm.

Radicalisation and The Prevent Duty

Children are vulnerable 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 school safeguarding approach. **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. **Extremism** is the vocal or active opposition to our fundamental values, including democracy, 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. **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 whether a child is likely to be susceptible to an extremist ideology, there are possible indicators that should be taken into consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or a deputy) making a Prevent referral. Although not a cause for concern on their own, possible indicators when taken into consideration alongside other factors or context may be a sign of being radicalised.

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of their functions, to have "due regard to the need to prevent people from

being drawn into terrorism”. The Prevent duty is part of schools’ and colleges’ wider safeguarding obligations.

The school is required to identify a Prevent Single Point of Contact (SPOC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism. The SPOC for The Crypt School is the DSL (Gemma Hargraves).

Mobile phones and cameras

Regulations surrounding the use of staff mobile phones and cameras are detailed in the acceptable use agreement and the Staff Code of Conduct.

Staff will not take pictures or recordings of pupils on their personal phones or cameras. We follow the UK General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

Appendix 2

LOW LEVEL CONCERN REPORT

Member of staff to whom the concern relates	
Name of individual sharing the concern*	
Date concern raised with Headmaster	

Details of the concern:

Context in which the concern arose:

Action taken:

Signature of Headmaster	
Date of completion of record	

*If the individual wishes to remain anonymous then that should be respected as far as reasonably possible. (KCSIE)
Further information on low level concerns can be found in Part Four, Section Two, of Keeping Children Safe in Education.
The Headmaster (and DSL as appropriate) will review the record regularly so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and acted on accordingly.