Vernham Dean Gillum's Primary School

Safeguarding and Child Protection Policy

2026/27 Academic Year

Approved by the Governing Body: September 2026

Next Review Date: September 2027

Safeguarding and Child Protection Policy (2026/27)

Document Control & Review

- As a Federation, we review this policy at least annually in line with DfE, HSCP, and HCC requirements and other relevant statutory guidance. This document is based on relevant and up-to-date guidance including *Keeping Children Safe in Education 2026*, *Guide for children and young people: Working Together to Safeguard Children 2023*, *Early years foundation stage (EYFS) statutory framework*, Hampshire Safeguarding Children Partnership, and the NSPCC.
- **Date approved by governing body:** September 2026
- **Review date:** September 2027

Quick Reference & Emergency Action Protocol

OUR VISION: *To create courageous, compassionate, creative citizens for the future in God's love.*

1. Key Safeguarding Contacts Directory

- **Strategic Safeguarding Lead (Executive Headteacher):** Ian Hickman
- **DSL:** Holly Bulpitt
- **Deputy DSLs:** Flo Nicoll, Nikki Pauk
- **Secure Safeguarding Mailbox:** dsl@svernhamdeangillums.hants.sch.uk (Monitored daily by DSLs & DDSLs)
- **Chair of Governors:** Paul Nicoll (Responsible for allegations against Executive Headteacher)
- **Safeguarding Governor:** Paul Nicoll
- **Online Safety Governor:** Kate Taylor

STEP 1: Immediate Disclosure or Concern Identified

- **In Immediate Danger or Emergency:** Call 999 immediately, then notify a DSL.
- **If a Child Discloses Abuse to You (The 7 R's Action Guide):**
    - **RECEIVE:** Accept what the child says calmly without showing shock or asking leading questions.
    - **REASSURE:** Tell them they were right to speak up, but never promise confidentiality or secrecy.
    - **RESPOND:** Ensure immediate physical safety and arrange medical care if needed.
    - **RECORD:** Make non-leading, factual notes using the child's exact words as soon as possible.
    - **REPORT:** Log on CPOMS within 24 hours (or *in person immediately* if at risk of significant harm).
    - **REMEMBER:** Maintain strict confidentiality—share details *only* with the DSL team.
    - **REVIEW:** Follow up with the DSL to ensure appropriate safeguarding action was initiated.

STEP 2: Log & Escalate the Concern

- **Standard Concern:** Log full details on CPOMS within 24 hours.
- **Risk of Significant Harm:** Speak directly to a DSL or Deputy DSL **in person immediately** before the end of the school day.
- **If No DSL is Available On-Site:** Contact the secure shared mailbox at `dsl@vernhamdeangillums.hants.sch.uk` or escalate directly to the Strategic Lead (Ian Hickman).

STEP 3: Concerns About an Adult / Allegations

- **Concern about a staff member, volunteer, or trainee:** Report directly to the Head of School or Executive Headteacher immediately.
- **Concern about the Executive Headteacher:** Contact the Chair of Governors, Paul Nicoll, immediately.
- **Low-Level Concerns:** Log via the school's low-level concerns reporting route for threshold determination.

3. Five Non-Negotiable Safeguarding Principles for All Staff

- **1. It Could Happen Here:** Maintain continuous vigilance. Safeguarding is the collective responsibility of every staff member, volunteer, and governor.
- **2. Child-Centred Approach:** Always act in the best interests of the child. Every child has an equal right to protection from harm regardless of background or identity.
- **3. Read KCSIE Part 1:** All staff must read Part 1 of Keeping Children Safe in Education in full and confirm their understanding annually.
- **4. Challenge Harmful Cultures:** Actively disrupt inappropriate peer behaviours, misogyny, and harmful "banter" to prevent the normalisation of child-on-child abuse.
- **5. Professional Whistleblowing:** Speak up promptly using whistleblowing procedures if you observe unsafe practices or unaddressed risks within the Federation.

4. Summary of Key Safeguarding Categories & Digital Risks

Note: Refer to Section 9 for statutory definitions regarding modern harms, including upskirting, hazing, and digital abuse.

- **Core Categories of Harm:** Physical Abuse, Emotional Abuse, Sexual Abuse, and Neglect.
- **Domestic Abuse & Operation Encompass:** Children experiencing domestic abuse at home are victims of harm; notifications from police/housing are acted upon immediately.
- **Digital & AI Harms:** Explicitly includes non-contact abuse, image-based abuse, and the creation or distribution of AI-generated explicit imagery (such as deepfakes).
- **Contextual & Extra-Familial Risks:** Staff must remain alert to risks outside the home, including peer-on-peer abuse, online exploitation, and community-based threats.

Section 1: Our Vision & Core Purpose

Our Vision for Safeguarding Through Faith, Hope, and Love, we aim to be a school where every child is seen, heard, and protected. We build a community of trust and resilience, supporting our children to speak out, engage in learning, and grow.

Seen, Heard, Protected—Together We Flourish.

- **1. PROTECTED (The Foundation):**
    - **For Pupils:** We ensure pupils know how to stay safe, online and offline, and know who to approach with concerns.
    - **For Families:** We maintain rigorous vetting and safety procedures, actively managing risks such as bullying and online harms.
    - **For Staff & Governors:** We implement consistent safety policies, maintain accurate records, and enforce codes of conduct linked directly to low-level concerns and whistleblowing procedures.
- **2. HEARD (The Agency):**
    - **For Pupils:** We listen to every concern with respect, treating pupil voices as important driving forces for action.
    - **For Families:** We maintain an open-door policy, valuing parental insights and communicating support plans with clarity.
    - **For Staff & Governors:** We practice professional diligence, looking beyond the surface and analysing safeguarding data proactively.

- **3. SEEN (The Relationship):**
    - **For Pupils:** We value every pupil as an individual, prioritising wellbeing and treating everyone with kindness and dignity.
    - **For Families:** We offer constructive, non-judgmental partnerships, working alongside external agencies when families face challenges.
    - **For Staff & Governors:** We provide trauma-informed, inclusive care that acknowledges individual needs and complex vulnerabilities.
- **4. TOGETHER WE FLOURISH (The Outcome):**
    - **For Pupils:** We build pupil confidence to learn, build friendships, and thrive in a secure setting.
    - **For Families:** We work as a unified team to champion attendance, learning, and overall wellbeing.
    - **For Staff & Governors:** We maintain high multi-agency standards, continuously developing expertise across the Federation.

Policy Statement Safeguarding is everyone's responsibility; it does not rest solely with the Designated Safeguarding Lead (DSL) and their deputies. In accordance with statutory guidance, this policy details our procedures for safeguarding and child protection across the entire school community. We maintain a vigilant attitude of "it could happen here" and commit to prompt policy reviews whenever gaps or process deficiencies are identified.

Section 2: Principles, Values & Core Commitments

- **Preventing Abuse:** We believe children and young people should never experience abuse of any kind.
- **Paramount Welfare:** The welfare of children is paramount in all the work we do and in all decisions we take.
- **Equal Protection:** All children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation, have an equal right to protection from harm.
- **Targeted Vulnerability Support:** We recognise that some children are additionally vulnerable due to previous experiences, dependency level, communication needs, or other challenges.
- **Gender-Questioning & Social Transition Support:** While affirming the equal right to protection for all, we recognise that gender-questioning children require a cautious, highly supportive, and child-centered approach. To ensure their physical, psychological, and mental well-being:
    - **Parental Priority:** The Federation will not initiate or agree to any action regarding social transition (such as changes to names, pronouns, or uniforms) without involving parents as a matter of priority, unless there is a clear, documented, and significant risk of harm to the child.
    - **Primary School Caution:** For primary-aged children across our schools, support for full or partial social transition will only be agreed in exceptionally rare circumstances, and ideally only with direct clinical involvement and guidance.
    - **Awareness of Biological Sex:** Staff must remain aware of the biological sex of all pupils, including those "living in stealth," particularly as they approach and go through puberty, to ensure their physical care, medical, and safeguarding needs are managed safely and appropriately.
- **Partnership & Direct Action:** We work openly with parents wherever possible, but we reserve the right to contact Local Authority Children's Social Care or the police without parental notification if it is in the child's best interests.

Section 3: Core Definitions & Frameworks

Core Safeguarding Frameworks

- **Safeguarding and Promoting the Welfare of Children:** A proactive, preventative process aimed at creating safe environments and taking action to achieve the best outcomes for all children. This involves protecting children from maltreatment (in-person and online), preventing impairment of health or development, ensuring safe environments, and acting early on vulnerabilities (e.g., SEND, mental health, kinship care).

- **Child Protection:** A specific, reactive aspect of safeguarding focused on how the school responds to children who have been significantly harmed or are at risk of significant harm.
- **Contextual Safeguarding:** Developed by Dr. Carlene Firmin (University of Bedfordshire), this approach recognises that as children grow, they are heavily influenced by extra-familial environments and relationships (e.g., school, community, peer groups, or online). We assess and address these risks to keep pupils safe across all settings.

Key Definitions & Legal Entities

- **Child:** Means everyone under the age of 18. This primarily applies to enrolled pupils, but extends to visiting children or visiting students.
- **Parent:** Refers to birth parents and any other adults holding a parenting role, including adoptive parents, step-parents, legal guardians, and foster carers.
- **Staff:** Applies to all individuals working for or on behalf of the school, full-time or part-time, in a paid or voluntary capacity (including governors, supply staff, trainee teachers, and regular volunteers).

Categories of Abuse and Harm

- **Abuse:** A form of maltreatment where someone inflicts harm or fails to act to prevent harm to a child. Can take place in a family, institutional, or community setting, by known individuals or strangers, and can occur wholly online or be facilitated offline via technology.
- **Harm:** Includes physical injury as well as ill-treatment that is not physical, such as emotional abuse or the developmental impact of witnessing the ill-treatment of others (especially domestic abuse).
    - *Domestic Abuse Exposure:* Children are victims of domestic abuse if they see, hear, or experience the effects of abuse at home. Under **Operation Encompass**, police forces have a statutory duty to notify schools of domestic abuse incidents involving their pupils. Additionally, local housing authorities must notify educational institutions immediately when a child is placed in temporary accommodation to ensure prompt pastoral support.
    - *Child-to-Parent/Caregiver Abuse:* The school acknowledges that children may cause physical, emotional, or financial harm to other family members within the household.
- **Child-on-Child Abuse:** Occurs when a child is abused, exploited, or bullied by their peers, both online and offline. This includes physical abuse, bullying (including cyberbullying), sexual violence, sexual harassment, and coercive or controlling behaviour.
- **Physical Abuse:** Hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, or otherwise causing physical harm. This includes Fabricated or Induced Illness (FII), where a carer fabricates or deliberately induces illness in a child.
- **Emotional Abuse:** The persistent emotional maltreatment of a child severe enough to cause adverse effects on their emotional, behavioural, and psychological development. This includes verbal abuse (criticism, belittling, or name-calling) and conveying that a child is worthless or unloved. Emotional abuse is inherent in all other forms of maltreatment.
- **Sexual Abuse:** Forcing or enticing a child to take part in sexual activities, regardless of whether they understand what is happening. Includes penetrative, non-penetrative, and non-contact activities (such as producing, viewing, or distributing sexual, nude, or semi-nude images). This explicitly encompasses the creation or sharing of AI-generated explicit imagery (such as deepfakes or "deep nudes").
- **Neglect:** The persistent failure to meet a child's basic physical, medical, educational, and/or psychological needs, likely to result in the serious impairment of health, safety, or development.

Section 4: Dealing with Safeguarding Allegations and Concerns Against Adults

Understanding the Spectrum of Conduct

In accordance with *Working Together to Safeguard Children* and *Keeping Children Safe in Education 2026*, Vernham Dean Gillum's Primary School maintains a clear distinction between an **allegation**, a **complaint**, a **professional concern**, and a **low-level concern (LLC)**.

Category	Definition	Key Examples	Management Route
Complaints	Breaches of internal policy or administrative practice that do not impact child safety.	• Breaches of the Code of Conduct • Data protection or confidentiality breaches • Misadministration of medication	Internal school complaint procedures.
Professional Concerns	Poor professional practice or conduct in front of pupils.	• Swearing, shouting, or inappropriate language • Making demeaning, scapegoating comments • Discussing personal/sexual relationships in front of pupils	Managed internally by the Head of School / Executive Headteacher.
Low-Level Concerns (LLCs)	Any behaviour that does not meet the harm threshold, but is inconsistent with the Staff Code of Conduct.	• Favoritism of a specific pupil • Giving personal gifts without approval • Seeking contact with pupils outside of school hours	Recorded and managed under the school's internal **LLC Procedures**.
Harm-Threshold Allegations	behaviour indicating an adult has harmed a child, committed a crime, or poses an ongoing risk.	• Physical abuse • Sexual misconduct or harassment • Actions indicating suitability risks (e.g. domestic abuse arrests)	**Immediate LADO Referral** (and potential Police/Social Care involvement).

Allegations That Meet the Harm Threshold

1. Trigger Criteria

This procedure must be initiated immediately if it is alleged that any member of staff, supply staff, volunteer, Governor, **trainee teacher**, or other adult working within the Federation has:

1. Behaved in a way that has harmed a child, or may have harmed a child; or
2. Possibly committed a criminal offence against or related to a child; or
3. Behaved towards a child or children in a way that indicates they would pose a risk of harm to children; or
4. Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

2. Assessing Suitability & Transferable Risk

When assessing the fourth suitability criterion, the Local Authority Designated Officer (LADO) and school leadership will evaluate the likelihood and impact of **transferable risk** to pupils. This includes private-life behaviours such as:

- Being a parent to children who are subject to a Child in Need (CIN) plan or are actively receiving **Family Help**;
- Arrests for offences against adults (e.g., domestic violence, assault);
- Presentations to other professionals regarding mental health crises, domestic abuse, or severe substance misuse;
- Promoting extreme political or religious viewpoints that could constitute a hate crime.

Referral & Management Procedure

Immediate Escalation Pathways

ADULT SAFEGUARDING CONCERN

Allegation against Staff / Volunteer / Trainee	Allegation against Head of School / Exec Head
↓	↓
Report to Head of School or Executive Headteacher	Report to Chair of Governors (Mike Vidler)

🚨 **Urgent Action:** If an individual is deemed to pose an *immediate* risk of harm to children, or there is physical evidence of a criminal offence, the Headteacher or Chair of Governors must contact the **Police** immediately.

The LADO Referral Process

1. **Contact LADO First:** Before any internal investigation is started, the case manager (Executive Headteacher or Chair of Governors) must contact the Hampshire LADO within **24 hours**:
    - **Phone:** 01962 876364
    - **Email:** child.protection@hants.gov.uk

2. **Formal Audit Trail Requirement:** In line with **KCSIE 2026** standards, the case manager must formally document and record the exact **written rationale** behind the decision of whether or not to refer the matter to the LADO. This record must be securely stored.
3. **Parental Notification:** The parents or carers of the child involved must be notified of the allegation as soon as possible. This notification may only be delayed if the LADO, Police, or Social Care explicitly advise that doing so would compromise an ongoing investigation.
4. **Internal Investigations & HR Advice:** If the LADO advises that the matter can be dealt with internally, the school will seek guidance from their HR provider to ensure full compliance with **Chapter 4 of KCSIE 2026** and HSCP procedures.

Supply Staff and Trainee Teachers

- **Supply Staff:** Although supply staff are not directly employed by the Federation, we have a statutory duty to report any allegations against them to the LADO. Any subsequent internal investigation will be conducted by the school's leadership in active partnership with the supply agency's HR representative (acting as the employer).
- **Trainee Teachers:** Safeguarding procedures and low-level concerns apply in full to all **trainee teachers** on placement. If an allegation is made against a trainee, the school will coordinate directly with the trainee's Initial Teacher Training (ITT) provider, ensuring the LADO is notified and the ITT provider's safeguarding leads are kept fully informed.

Managing Low-Level Concerns (LLCs)

To prevent the development of a compromise-prone safeguarding culture, the Federation proactively manages behaviours that do not meet the harm threshold but still breach professional standards:

- **Reporting:** All low-level concerns must be shared responsibly with the Executive Headteacher or Head of School and logged in writing.
- **Systemic Review:** Safeguarding leads will systematically review LLC logs termly to identify any patterns of escalating, concerning, or problematic behaviour.
- **Escalation:** If a pattern of LLCs indicates a cumulative risk that meets the harm threshold, a formal referral to the LADO will be made.
- **Uncertainty:** If there is any doubt regarding whether a behaviour constitutes an LLC or a full allegation, the school will contact the LADO for threshold advice.
- **Learning Lessons:** If an allegation is concluded to be unfounded, false, malicious, or unsubstantiated, the case manager and LADO will conduct a review to identify institutional lessons learned and make any necessary practice improvements.

Section 5: Federation Roles & Responsibilities

1. The Strategic Safeguarding Lead (Executive Headteacher)

- **Federation Governance:** Holds overall strategic leadership responsibility for the safeguarding culture, standards, and regulatory compliance across all schools within the Federation.
- **Policy Mobilisation:** Ensures that safeguarding policies and procedures adopted by the governing body are fully operational, understood, and followed by all staff.
- **Staff Vetting Oversight:** Ensures that mandatory, compliant pre-employment checks are completed for all staff, volunteers, and trainee teachers before they commence work.
- **Policy Decision Authority:** Holds ultimate executive authority on implementing statutory guidance (such as mobile phone-free environments) within the unique context of each school.
- **Quality Assurance:** Directs annual filtering and monitoring reviews in coordination with the IT lead and DSLs for governing body review.

2. Heads of School

- **Operational Integrity:** Oversee the day-to-day operation of the safeguarding policy on their specific school site.
- **Professional Standards:** Ensure teachers maintain public trust in the profession by actively safeguarding children's wellbeing.
- **Managing Staff & Trainee Allegations:** Handle initial safeguarding concerns or allegations raised against other staff members, including permanent staff, temporary workers, and **trainee teachers** on placement.
- **Threshold Determinations:** Determine if a safeguarding concern about a staff member or trainee teacher meets the statutory harm threshold or is classified as a "low-level concern," formally recording the rationale behind these decisions.

3. Designated Safeguarding Leads (DSLs) and Deputies

- **Senior Leadership Status:** Must be senior leadership team members who take lead responsibility for safeguarding, child protection, online safety, and filtering/monitoring systems.
- **Availability & Cover:** Ensure a DSL or Deputy is always available during term time to discuss concerns with staff, utilising cover arrangements (such as the dsl@vernhamdeangillums.hants.sch.uk shared mailbox) when offline.
- **Referrals & Agency Liaison:** Coordinate referrals to statutory agencies (social care, police, MASH).
- **Educational Advocacy:** Promote the educational outcomes of children who have or have had a social worker.
- **Information Sharing & Contextualisation:** In accordance with the *Children's Wellbeing and Schools Act 2026*, exercise expert professional judgement to ensure shared safeguarding information is focused, proportionate, and contextualised.
- **File Transfer and Structured Summaries:** Securely maintain child protection files and transfer them to a new setting within **five working days** of a pupil moving. When transferring files, the DSL must provide a clear, structured summary identifying current concerns, intervention history, and crucial safety context (rather than

sending raw, unindexed files alone). Upon receiving files, explicitly determine what information must be shared with staff to assess risks to others.
- **Ultimate Accountability:** While day-to-day activities may be delegated to Deputy DSLs, the ultimate lead responsibility remains solely with the DSL and cannot be delegated.

4. Chair of Governors

- **Allegations Management:** Holds sole responsibility for managing safeguarding allegations made against the Executive Headteacher.
- **Governing Body Vetting:** Undergoes an enhanced DBS check carried out by the Secretary of State before taking office, and ensures enhanced DBS, identity, and Section 128 checks are completed for all other governors to verify they are not prohibited from school management.

5. Governors (Governing Body)

- **Strategic Compliance Oversight:** Hold ultimate responsibility for ensuring the school complies with its statutory safeguarding duties.
- **Policy Review & Resource Allocation:** Ensure the Child Protection Policy, Behaviour Policy, and Staff Code of Conduct are in place, reviewed annually, and publicly accessible. Ensure the DSL is appointed and given sufficient time, funding, and resources.
- **Strategic Training:** Ensure all staff receive induction training and regular updates, and that governors undergo induction training to equip them to strategically challenge the school's safeguarding arrangements.
- **Premises Compliance:** Ensure school premises comply with statutory regulations (e.g., separate toilets for boys/girls aged eight and over, and private changing spaces for pupils aged 11 and over).

6. All Staff (Collective Duty)

- **Absenteeism Response:** Be aware of the school's safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods.
- **Teachers' Standards 2012:** All teachers must safeguard children's wellbeing and maintain public trust in the teaching profession as part of their core professional duties.
- **Child-Centred Approach:** Maintain a child-centred approach that prioritises the best interests of the child at all times.
- **Mandatory Reading:** Read Part One of *Keeping Children Safe in Education 2026* in full (following the removal of the condensed Annex A) and confirm understanding.
- **Vigilance & Early Identification:** Maintain an "it could happen here" attitude; remain alert to children who may benefit from Family Help or are at risk of abuse, neglect, or exploitation.
- **Parental Offending:** Remain alert to children affected by parental offending (prisoners' children) as a specific group that may benefit from additional support.
- **Immediate Reporting:** Log all concerns on CPOMS within **24 hours** (or immediately in person to a DSL if a child is at risk of significant harm), never promising a child secrecy.
- **Disrupting Harmful Cultures:** Actively challenge inappropriate peer behaviours, such as harmful "banter," misogyny, or peer-on-peer harassment, to prevent a culture that normalises abuse.
- **Whistleblowing:** Promptly raise concerns about poor or unsafe practice within the school using established whistleblowing procedures.

Section 6: Confidentiality and Information Sharing

We recognise that effective information sharing is a vital component of safeguarding and promoting the welfare of children. All matters relating to child protection are treated with the highest level of confidentiality.

- **Legal Frameworks:** Information will be shared in accordance with our legal obligations under the UK General Data Protection Regulation (GDPR), the Data Protection Act 2018, and the Data (Use and Access) Act 2025. These frameworks are facilitators, not barriers, to sharing information for safeguarding purposes.

- **Statutory Information Sharing Duty:** We strictly adhere to the information-sharing duty introduced under the *Children's Wellbeing and Schools Act 2026*, which mandates specified bodies to disclose relevant safeguarding and welfare information to support early identification and intervention.
- **Distinguishing Records:** To maintain accuracy, objectivity, and fairness, all safeguarding and child protection records must clearly distinguish between objectively observed concerns/facts, professional opinion/assessments, and historical information.
- **Proportionality:** In line with DfE guidance, information will be shared internally on a strictly "need-to-know" basis with statutory agencies and relevant staff, ensuring it is necessary, proportionate, and relevant.
- **No Promises of Secrecy:** Staff cannot promise a child that a disclosure will be kept confidential. We will be transparent with children and families about our duty to share information, unless doing so would place the child at further risk of harm.

Section 7: Training & CPD Framework

Staff Safeguarding Induction & Annual Training

- **Mandatory Reading:** All staff, including those who do not work directly with children, must read **Part One of *Keeping Children Safe in Education 2026* in full** and confirm their understanding annually. Staff must provide a signed, written, or digital confirmation verifying they have read and understood this document during their induction.
- **Childcare Disqualification Briefing:** New staff receive a specific briefing on the Childcare Disqualification Regulations during their induction, ensuring they understand their continuous contractual duty to disclose changes in circumstances.
- **Annual Safeguarding Training:** All staff, including new starters, trainee teachers, and regular volunteers, receive annual safeguarding training covering key statutory updates. This training includes online safety, covering an understanding of the expectations and specific roles and responsibilities in relation to filtering and monitoring systems. This training is delivered by the Strategic Safeguarding Lead, a schools DSL, a Deputy DSL, or a qualified external safeguarding professional.
- **Mid-Year Joiners:** Any staff member joining the Federation mid-year must receive full safeguarding training from a DSL before commencing work on schools.
- **DSL & Deputy Professional CPD:** All DSLs and Deputy DSLs must attend formal refresher training at least **every two years** to maintain their expert status and authority. They also participate in regular peer reviews across the Federation to align practice.
- **Weekly Safeguarding Briefings:** Safeguarding remains a continuous focus. Important updates, local context alerts, case study scenarios, online safety trends, and general safeguarding news are discussed weekly during staff briefings.

Section 8: Procedures: Handling a Disclosure (The 7 R's)

When a member of staff suspects abuse, identifies indicators of harm, or receives a direct disclosure of abuse from a pupil, they must immediately apply the **Seven R's** framework to ensure a secure, structured, and legally compliant response:

1. Note: We recognize that not everyone who has been subjected to abuse identifies with the term 'victim'; we remain child-centred and will use terminology the child is most comfortable with.
2. **Receive:** Listen to the child actively and calmly. Do not show shock, anger, or judgment. Accept what the child is saying at face value; do not cross-examine, ask leading questions, or attempt to conduct an investigation.
3. **Reassure:** Reassure the child that they have done the right thing by speaking out. Be transparent: explain honestly that you cannot promise "secrecy," as you must share this information with a trusted safeguarding leader who can help keep them safe.
4. **Respond:** Ensure the immediate physical safety of the child. If urgent medical attention is required, call emergency services immediately; do not delay medical care to locate a DSL.

5. **Report:** Inform your schools DSL (Holly Bulpitt) **immediately and in person** if the child is in immediate danger, or within **24 hours** for all other concerns.
6. **Record:** Complete an accurate, objective, and strictly factual record of the disclosure on CPOMS as soon as possible, and **within 24 hours**. Use the child's own words in quotation marks wherever possible; do not record personal opinions or speculation.
7. **Remember:** Maintain absolute professional confidentiality. Do not discuss the disclosure with other colleagues, parents, or pupils. Only share details on a strict "need-to-know" basis with those who have a statutory duty to protect the child.
8. **Review:** Follow up with the DSL to ensure that appropriate actions, family support measures, or multi-agency referrals have been formally initiated.

Key Statutory Referral Contacts

🚨 **Immediate Danger or Emergency:** Always dial **999** immediately.

- **Hampshire Children's Services:** 0300 555 1384 | Hampshire Inter-Agency Referral Form
- **Wiltshire MASH (Multi-Agency Safeguarding Hub):** 0300 456 0108 | Wiltshire Children's Services Portal

Section 9: Specific Harm & Intervention Frameworks

Child-on-Child Abuse

- We recognise that children are capable of abusing their peers. Vernham Dean Gillum's Primary School maintains a strict, **zero-tolerance culture** toward all forms of peer-on-peer abuse. Harmful behaviours such as sexual violence, sexual harassment, upskirting, initiation/hazing type violence and rituals, misogyny, misandry, racism, homophobia, and faith-based prejudice will never be tolerated, dismissed as "banter," or minimised. They must be challenged immediately by staff. Our intervention framework includes timely, evidence-based support aimed at preventing the escalation of harmful behaviours and stopping children from committing abuse or violence, rather than purely reactive discipline.
- In accordance with Part 5 of Keeping Children Safe in Education 2026, we apply specific high-level statutory frameworks to all reports of child-on-child sexual harassment and sexual violence.
- **Response Protocol for Peer-on-Peer Sexual Violence and Harassment:**
    - *Immediate Support:* Any child making a report of sexual violence or harassment will be taken seriously, kept physically safe, and provided with immediate pastoral care and support.
    - *DSL Notification:* The staff member receiving the report must notify a schools DSL or Deputy as soon as practically possible, and **at least within 24 hours**.
    - *Parental Communication:* Parents or carers will normally be informed of the incident on the same day, unless doing so is assessed by the DSL as placing the child at greater risk of harm.
    - *Statutory Action:* If a child is deemed to be at risk of significant harm, or has been harmed, a formal referral will be made to Local Authority Children's Social Care (and the police, if a crime is suspected) immediately.

Serious Violence & Weapons

To protect our school community from the risks associated with serious youth violence and weapons:

- **Reporting Intent:** All staff must immediately report to the DSL any concerns, physical evidence, disclosures, or expressions of intent regarding a pupil carrying, using, or planning to use a weapon.
- **DSL Risk Assessment Duty:** Upon receiving any report involving a weapon, the DSL holds an explicit statutory duty to assess not only the immediate risk to the individual pupil but also the wider risk of harm to other pupils, staff, and visitors within the school environment.

The Family Help Process

Family Help involves identifying as early as possible if a child or family needs support, and actively helping them to access coordinated support and statutory services (including those under Section 17 and Section 47 of the Children Act 1989). Referrals to Family Help are assessed against specific statutory criteria and levels of need, determining whether support is required at the 'Targeted Early Help' level or through statutory services under Section 17 or Section 47 of the Children Act 1989.

Our staff maintain professional curiosity and are particularly alert to the potential need for Family Help for any child who:

- Is disabled, has a complex health condition, or has special educational needs (SEND).
- Has an identified mental health need or is acting as a young carer.
- Is showing signs of being drawn into anti-social or criminal behaviour, or is identified as being at risk of modern slavery, trafficking, or criminal/sexual exploitation.
- Is experiencing multiple suspensions, is at risk of exclusion, or is currently placed in Alternative Provision.

Section 10: Specific Safeguarding Contexts & Safe Recruitment

Reasonable Force

While detailed physical intervention rules are outlined in the school's Behaviour Policy, for safeguarding and child protection purposes, **"reasonable force"** is strictly defined as using no more force than is absolutely necessary in the specific circumstances, used for the least amount of time required to restore safety.

Medical Conditions & Safeguarding Triggers

While standard medical incidents, management of allergies, or asthma attacks are not inherently child protection issues, they will trigger a formal safeguarding review if the circumstances suggest neglect or abuse. Examples include:

- A child being repeatedly sent to school without prescribed, life-saving medication (such as EpiPens or inhalers);
- Consistent parental failure to engage with medical care plans, putting the child's physical well-being at risk.

Safe Recruitment: Online Searches

As part of the Federation's robust pre-employment checks, online searches for shortlisted candidates must be conducted via standard online search engines. However, these searches must be approached with caution to ensure that any flagged or retrieved information relates strictly and factually to the correct individual, protecting candidate fairness and GDPR compliance.

Safe Recruitment & Vetting Standards

Volunteer Vetting & Regulated Activity (Crime and Policing Act 2026 Amendment) In accordance with the Crime and Policing Act 2026 and Keeping Children Safe in Education 2026, Vernham Dean Gillum's Primary School no longer applies a "supervision exemption" to volunteers.

- **Regulated Activity Threshold**: Any volunteer who teaches, trains, instructs, cares for, or supervises pupils on a regular basis - defined as meeting the period condition of more than 3 days in any 30-day period, or any overnight stay - is legally deemed to be engaged in Regulated Activity, regardless of whether a member of school staff is present at all times.
- **Mandatory Checks**: All volunteers meeting this threshold must undergo an Enhanced DBS Check with Children's Barred List Information prior to commencing their regular duties.

Occasional Volunteers: Parent helpers assisting on one-off, occasional day trips or singular school events (not meeting the frequency threshold) remain out of regulated activity, but must remain supervised at all times.

Fabricated or Induced Illness (FII)

Section 1: Modern Definitions (HIPS & RCPCH Standards)

Vernham Dean Gillum's Primary School operates strictly in accordance with the **HIPS Multi-Agency Guidance on Fabricated or Induced Illness by Carers**. Staff must understand that FII is a form of physical/emotional abuse and neglect that occurs when a parent or carer acts to convince professionals that their child is ill, or more severely impaired than they actually are.

We recognise the modern clinical distinction between two phases:

- PERPLEXING PRESENTATION (PP): The child's physical/mental health state is unclear or discrepancies exist, but there is no immediate, perceived risk of serious harm.
- FABRICATED OR INDUCED ILLNESS (FII): A clinical situation where there is a clear likelihood of harm to the child's health, development, or daily life due to carer actions.

The Four Methods of Fabrication/Induction

There are four primary ways a parent or carer may fabricate or induce illness in a child:

1. **Fabrication of Signs and Symptoms:** Presenting false descriptions of physical or psychological symptoms or history.
2. **Falsification of Records and Specimens:** Tampering with hospital records, letters, or specimens of bodily fluids (e.g., adding sugar or blood to urine).
3. **Exaggeration of Real Conditions:** Deliberately exaggerating minor, genuine ailments, leading to highly unnecessary investigations, medical treatments, or special equipment.
4. **Direct Induction of Illness:** Actively causing the child to become ill (e.g., administering unprescribed medication, poisoning, or withholding essential nutrition/hydration).

Educational Alerting Signs (What Staff Must Look For)

While medical professionals lead the clinical diagnosis, school staff are uniquely positioned to spot the day-to-day "alerting signs":

- **Curtailed School Life:** The child is repeatedly kept off school, or is restricted from normal activities (e.g., PE, playground games, school trips) due to reported illnesses that are not corroborated by school observations.
- **Unnecessary Mobility/Medical Aids:** The child is arriving at school with wheelchairs, crutches, dietary restrictions, or complex medication regimes that do not align with their observed independent capabilities.
- **Observation Discrepancies:** A sharp contrast between what the parent describes (e.g., *"they cannot walk more than ten steps"* or *"they have frequent seizures"*) and what the child actually does naturally and safely at school when the parent is absent.
- **Inexplicable Lack of Response:** The child exhibits a poor or highly irregular response to prescribed, standard treatments or medications.
- **Parental Over-Medicalisation:** Parents who demonstrate a seemingly advanced, hyper-focused medical knowledge, make extensive use of online diagnostic searches, or regularly move the child between different GP practices and consultants ("doctor shopping").

Referral Procedures and Actions

> **Step 1: Alerting Sign Identified**
> Staff member identifies alerting signs of suspected Perplexing Presentation (PP) or Fabricated or Induced Illness (FII).

↓

Step 2: Chronology Compilation
DSL immediately compiles an educational and developmental chronology (attendance, PE participation, medical observations).

↓

Step 3: Referral to Children's Social Care (MASH)
DSL submits formal referral to Hampshire MASH.

↓

CRITICAL MANDATE: No Parental Contact
DO NOT discuss suspicions with or notify the parent prior to making the referral.

1. Compiling a Chronology

If a staff member raises a concern regarding possible FII, the DSL will immediately compile a detailed educational and developmental **chronology**. This must clearly record:

- Historical school attendance rates and documented reasons for absence.
- Direct, objective, and factual observations of the child's physical functioning at school (e.g., running at playtime, eating normal foods) vs. the parent's reported restrictions.

2. The Parental Consent Guardrail (Critical Safeguard)

> 🚨 **Mandatory Safeguarding Protocol:** If FII is suspected, staff must **never** seek parental consent, seek explanation from, or notify the parents before making a referral to Children's Social Care.

Discussing suspicions with the parent can dramatically escalate the risk of the parent intensifying the fabrication, seeking immediate discharge from medical care, or directly inducing physical illness in the child to "prove" their claims.

3. Multi-Agency Referral

Where there is a concern that a child's health, development, or safety is impaired due to parental actions, a referral must be made directly to the **Hampshire Multi-Agency Safeguarding Hub (MASH)** in accordance with HIPS procedures. The school will actively cooperate with Social Care, Paediatricians, and the Police in any subsequent multi-agency Strategy Meetings.

Safeguarding & Pupil Mental Health

Section 1: The Safeguarding Link

At Vernham Dean Gillum's Primary School, we treat mental health concerns as potential **safeguarding indicators**. While a pupil may have an isolated mental health issue, staff must maintain professional curiosity and recognise that sudden changes in emotional wellbeing, severe anxiety, eating disorders, or self-harm can be a direct response to abuse, neglect, or exploitation.

Section 2: Statutory Warning Signs (What Staff Must Look For)

Classroom teachers and support staff are uniquely placed to observe changes. In line with **KCSIE 2026**, staff must remain alert to and report the following indicators:

- **Significant Behavioural Shifts:** Sudden, uncharacteristic irritability, aggression, or extreme mood swings.
- **Social Withdrawal:** A pupil pulling away from their friends, withdrawing from classroom interaction, or avoiding social situations they previously enjoyed.
- **Loss of Interest:** Rapid loss of enthusiasm for school, PE, hobbies, or activities that usually interest them.
- **Physical Signs of Distress:** Frequents reports of unexplained physical ailments (e.g., headaches, stomach aches), extreme lethargy, persistent difficulty sleeping, or sudden neglect of personal hygiene.
- **Explicit Risk Signs:** Direct disclosures, talking or writing about death/suicide, or any physical signs of self-harm or self-neglect.

Section 3: The Mental Health Decision & Escalation Pathway

When a staff member identifies a mental health concern, they must categorise and escalate it using our three-tier framework:

Risk Level	Indicators & Severity	Required Escalation Action
Pastoral Level (Wellbeing Concern)	Mild anxiety, stress, or sadness. No immediate risk of harm.	Provide in-school pastoral comfort, monitor, and discuss low-key support with parents.
Safeguarding Level (Potential Harm)	Signs of self-harm, eating disorders, suicidal thoughts, or trauma/abuse indicators.	Refer immediately to the DSL via CPOMS. DSL assesses and coordinates intervention.
Crisis Level (Immediate Danger)	Immediate physical danger of harming self or others.	Escort pupil to safe space, alert first aider/DSL, call 999 or take to A&E immediately.

- **Pastoral Level (Wellbeing):** The student is showing mild anxiety, sadness, or struggles with transition. Class teacher provides initial comfort, monitors, and discusses low-key support strategies with parents.
- **Safeguarding Level (Potential Harm):** The pupil shows indicators of self-harm, an eating disorder, suicidal thoughts, or there is suspicion that their mental health is a result of trauma/abuse. **This must be referred immediately to the DSL via CPOMS**.
- **Crisis Level (Immediate Danger):** The pupil is in immediate physical danger of harming themselves or others. Staff must escort the pupil to a safe space, alert a first aider/DSL, and if necessary, contact emergency services (999) or take the child to A&E immediately.

Section 4: Parental Engagement and Gillick/Fraser Competency

1. Default Position: Partnership with Parents

Our default position is always to work in open, transparent partnership with parents and carers. If a mental health concern is identified, the school will discuss these worries with the child's parents, work to build a joint support plan, and seek parental consent for external specialist referrals (such as CAMHS or local counselling).

2. Exceptions: Child at Risk

If the DSL believes that informing the parents of a pupil's mental health disclosures would put the child at direct risk of significant harm (e.g., if the distress is linked to abuse, domestic violence, or severe familial rejection), the DSL will delay parental notification and seek advice from Children's Social Care.

3. Gillick Competence & Fraser Guidelines (Primary School Application)

- **The Law:** The Gillick Competency test assesses whether a child under the age of 16 has sufficient understanding and intelligence to give informed consent to medical treatment or confidential support without parental knowledge or consent.
- **Primary Application:** Within our primary settings across Vernham Dean Gillum's Primary School, it is **highly exceptional** for a pupil to be assessed as fully Gillick competent to receive clinical mental health interventions or counselling without parental knowledge, due to their developmental stage.
- **The DSL Role:** Any assessment of Gillick competency must only be conducted by a qualified clinician or the DSL. If a child requests confidential support, the school's primary effort will be to support and encourage the pupil to involve their parents. All decisions regarding Gillick/Fraser applications must be meticulously recorded on CPOMS, detailing the exact rationale.

Your draft contains the vital foundational structure of online safety, but under the newly released **KCSIE 2026** statutory requirements, this section requires a significant, direct upgrade.

The Department for Education has dramatically elevated the accountability framework for schools—specifically around the **annual review and testing** of filtering and monitoring, **generative AI risks** (which have transitioned from advisory to heavily integrated statutory rules), and the use of the term **nudes and semi-nudes**.

🔍 Key 2026 Statutory Updates Applied:

1. **Mandatory Annual Reviews & Records:** It is now a statutory requirement to review the effectiveness of filtering and monitoring systems *at least* once every academic year and, crucially, **keep formal records of these technical checks and tests**. This can no longer be outsourced entirely to an IT provider without leadership oversight.
2. **Generative AI Risk Expansion:**
    - **Contact Risk:** Updated to include interactions with conversational AI chatbots (e.g., emotional attachment/dependency risks).
    - **Conduct Risk:** Explicitly covers the creation, modification, or sharing of AI-generated or modified "nudes and semi-nudes" (digitally altered or "deepfake" content).
    - **Image Scraping Guardrail:** Addressing the risk of public school photos being scraped by automated tools to create AI-generated abuse materials.
3. **Misinformation, Disinformation & Conspiracy Theories:** Integrated under *Content* risks.
4. **The "Nudes and Semi-Nudes" Terminology:** Updated throughout to replace older phrasing, aligning with the standard adopted in KCSIE 2026.

Online Safety, Filtering, and Monitoring Policy (2026/27)

Section 1: The Four Cs of Online Risk

Vernham Dean Gillum's Primary School categorises online safeguarding threats into four distinct areas of risk, which are fully integrated into our curriculum and staff training:

Risk Category	Definition	2026 Specific Focus & Threat Areas

Content	Being exposed to illegal, inappropriate, or harmful material.	• Pornography and sexually explicit material. • Radicalisation, extremism, and hate speech. • **Misinformation, disinformation, and conspiracy theories**. • Self-harm and suicide promotion.
Contact	Subjected to harmful online interaction with other users or systems.	• Online grooming and child sexual exploitation. • Peer-on-peer pressure and cyberbullying. • **Generative AI Systems:** Conversational chatbots that simulate human interaction, which carry severe risks of emotional dependency or manipulation.
Conduct	Personal online behaviour that causes or increases likelihood of harm.	• Consensual and non-consensual sharing of **nudes and semi-nudes**. • The creation or alteration of images using **AI-powered digital manipulation (deepfakes)**. • Cyberbullying and online harassment.
Commerce	Financial and commercial risks targeting children.	• Online gambling and predatory commercial advertising. • Phishing scams, identity theft, and financial extortion (including AI-driven voice or video cloning scams).

Section 2: Statutory Filtering and Monitoring Requirements

We strictly adhere to the DfE's *Meeting digital and technology standards in schools and colleges*. School leadership holds ultimate accountability for these systems; we do not delegate safeguarding responsibility to external IT providers.

1. Mandatory Annual Review & Testing Audit

- **The Annual Review:** The Governing Body and Senior Leadership Team must formally review the effectiveness and suitability of our filtering and monitoring systems **at least once every academic year**.
- **The Testing Log:** We carry out active, physical testing of our filtering blocks across various locations and internet-connected devices (including school tablets, laptops, and guest networks).
- **Record-Keeping:** In line with **KCSIE 2026**, a central written log must be maintained detailing:
    - The date and time of the system tests.
    - Specific devices, software environments, and locations tested.
    - Any filtering bypasses or system vulnerabilities identified.
    - The immediate corrective actions taken.
- The results of the annual filtering and monitoring system review, including any identified vulnerabilities and corrective actions, are formally reported to and noted by the full Governing Body.

2. DSL Strategic Responsibility

Our Designated Safeguarding Leads (DSLs) are trained to understand the specific capabilities and limitations of our school's filtering and monitoring systems. This technical oversight and the escalation pathway for system alerts is a core, documented component of the DSL job description.

Section 3: Generative AI and Emerging Technology Safeguards

Generative Artificial Intelligence is treated as a highly dynamic threat environment. We implement the following operational safeguards:

- **Inappropriate Material Generation:** Filtering systems are configured to block prompts and outputs that attempt to generate or display harmful, abusive, or age-inappropriate content using AI engines.
- **Image Scraping Protections:** To protect our pupils' likenesses from being harvested by automated scraping tools (which are used by perpetrators to compile databases for AI-generated deepfake manipulation), the Federation limits the publication of high-resolution portrait photos of children on public-facing school websites and social media channels.
- **Cognitive and Emotional Risks:** Staff are trained to monitor children for signs of intense emotional attachment or dependency on AI companion tools or chatbots, which can lead to psychological isolation or grooming-style vulnerabilities.
- **Reporting Financial Exploitation (Commerce):** Where pupils or staff are targeted by phishing campaigns, digital extortion, or sophisticated financial scams, the school will immediately report the incident to the **Anti-Phishing Working Group (APWG)** and local cyber-crime units.

Section 4: Staff Training and Curriculum Integration

- **Staff Training:** All staff, including temporary and supply workers, receive regular training on identifying online risks, understanding the school's filtering alert systems, and knowing how to instantly escalate a digital safeguarding concern.
- **Curriculum Delivery:** Online safety is not treated as a one-off lesson. It is dynamically embedded within the computing curriculum, RSHE, and assemblies, focusing on critical thinking, verifying facts (to counter fake news and misinformation), and understanding digital consent.
- **Parental Collaboration:** The Federation hosts regular workshops and distributes resources to parents and carers, establishing consistent, safe boundaries for device usage, social media access, and AI interactions at home.

Transfer of Safeguarding and Educational Information upon School Transition

Section 1: The Safeguarding File vs. Educational File (Two Clear Pathways)

When a pupil leaves a school within Vernham Dean Gillum's Primary School to attend a new educational setting, two separate transfer procedures must take place:

File Type	Governing Guidance	Transfer Timeline
The Educational Record & CTF (Main Pupil File)	The Education (Pupil Information) (England) Regulations 2005 (as amended)	Within 15 school days of the pupil ceasing to be registered

File Type	Governing Guidance	Transfer Timeline
The Safeguarding / Child Protection File (Confidential)	Keeping Children Safe in Education (KCSIE)	Within 5 school days of an in-year transfer, or within the first 5 days of a new term

Section 2: Protocol for Transferring Safeguarding Files

To ensure children do not "fall through the gaps" during school transitions, our Designated Safeguarding Leads (DSLs) will adhere to the following statutory protocol:

- **Timeline Mandate:** The DSL must ensure the child's safeguarding/child protection file is transferred to the receiving school **within 5 school days** of an in-year transfer, or **within the first 5 days of the start of a new term**. This is to ensure the new school has vital support mechanisms ready when the child arrives.
- **Secure Transit:** Safeguarding files must **never** be sent with the main academic file. They must be transferred separately and securely:
    - **Direct Digital Transfer:** Securely via CPOMS (using the secure school-to-school transfer mechanism).
    - **Physical Files:** If a digital transfer is not possible, paper files must be hand-delivered by the DSL (or registered post), and a **signed receipt of delivery** must be obtained and kept on our system for audit purposes.
- **Confirming Receipt:** The DSL must actively chase the receiving school until written confirmation of receipt is officially documented.
- **Sharing Information in Advance:** If a transferring child has complex safeguarding or SEND needs, our DSL will contact the receiving school's DSL *in advance* of the transition to verbally brief them on the context and help them prepare.

Section 3: Regulation Exceptions and Children Missing Education (CME)

1. The "Unknown Destination" Exception

As outlined in **Regulation 9(6)** of the *Education (Pupil Information) (England) Regulations 2005*, the requirement to transfer the file within 15 school days does not apply if:

- It is not reasonably practicable for our school to identify or locate the pupil's new school.
- The pupil was registered at our school for **less than four weeks**.

2. Children Missing Education (CME) Action Plan

If a child ceases to attend a Federation school and their destination school is unknown, we will **not** simply archive the files. The school will immediately activate its CME procedures:

Step 1: Child leaves or stops attending school

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Step 2: School makes reasonable initial enquiries
(Phone calls, home visits, emails)

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Step 3: Destination still unknown after 10 days
Submit official CME Referral to the Local Authority

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> **Step 4: CME Team finds new school**
> DSL securely transfers safeguarding file to new DSL within 5 days.

- **Enquiries:** The school will carry out initial checks (phone calls, emails, emergency contacts, and home visits where appropriate).
- **Referral:** If the child's location or new school remains unknown after **10 consecutive school days**, a formal **Children Missing Education (CME)** referral will be made to the Hampshire County Council CME team.
- **Records Retained:** The safeguarding file will be held securely by our school under strict lock and key (or within our secure CPOMS archive).
- **Inter-Agency Notification:** Once the CME team or any other agency locates the child's new placement, our DSL will securely send the safeguarding records to the new setting **within 5 school days** of receiving the notification.

Policy: Children Missing from Education (CME) 2026

Prejudice-Based Abuse and Hate Incidents Policy (2026/27)

Section 1: Definition of Prejudice-Based Abuse & Hate Incidents

Vernham Dean Gillum's Primary School defines prejudice-based abuse (or a hate incident/crime) as **any incident or criminal offence which is perceived by the victim, or any other person, to be motivated by hostility, bias, or prejudice**.

This hostility is directed toward a person's real or perceived protected characteristics under the **Equality Act 2010**:

Disability	Race	Religion	Gender Identity / Re-assignment	Sexual Orientation
Including learning and physical needs	Including colour, nationality, and ethnicity	Including lack of belief	Including gender reassignment and identity	Including homophobia, biphobia, etc.

> 💡 **The Hostility Rule:** The perpetrator does not need to feel deep-seated "hate". Showing active hostility, bias, or discriminatory prejudice through words, actions, or exclusion is sufficient to classify the event as prejudice-based abuse.

Section 2: How Prejudice-Based Abuse Manifests in School

Staff must maintain professional curiosity and actively challenge the following behaviours, recording them as safeguarding/behaviour concerns on CPOMS:

- **Verbal and Written Abuse:** Derogatory name-calling, targeted insults, discriminatory "jokes," or using slurs (e.g., homophobic, racist, or disablist language).
- **Visual Hostility:** Hate-based graffiti or damage on school furniture, books, or building walls.

- **Extremist Activity:** Wearing badges, displaying symbols, or distributing literature belonging to known right-wing, extremist, or hate-sanctioning organisations.
- **Social Exclusion & Hostility:** Refusing to cooperate or sit with others due to a real or perceived protected characteristic, or inciting others to bully a specific pupil.
- **Classroom Disruption:** Prejudiced, hostile, or discriminatory comments calculated to cause offense during classroom lessons or debates.
- **Radicalisation Recruitment:** Attempts to influence or recruit other pupils into groups or movements that support violence, discrimination, or hatred.

Section 3: The Federation's Response and Action Protocol

When an incident of prejudice-based abuse is identified, the school will act immediately using a dual-track approach: **Robust Safeguarding Support** and **Clear behaviour Management**.

SAFEGUARDING TRACK (Victim Support)	BEHAVIOUR & SYSTEM TRACK (Perpetrator Action)
• Log on CPOMS immediately • Allocate a trusted staff mentor • Establish safe spaces and peer "buddy" plan • Monitor continuously for ongoing emotional impact	• Apply clear disciplinary sanctions • Conduct targeted educational/restorative work • Report anonymised incident data to Governors • Analyse CPOMS logs for wider trends

1. Immediate Safeguarding Actions (Supporting the Victim)

- **CPOMS Recording:** The incident must be fully documented on CPOMS by the identifying staff member, specifying the targeted protected characteristic.
- **No Dismissal as "Banter":** Under no circumstances will staff dismiss the behaviour as teasing or a phase.
- **Active Mentoring:** The victim will be assigned a trusted adult mentor to check in regularly, reinforce that they are not to blame, and help rebuild their sense of safety and belonging.
- **Peer Support:** Where appropriate, we will establish peer support buddies to ensure the child feels safe during unstructured times (break and lunch).

2. Addressing the Perpetrator (Sanctions and Education)

- **Clear Disciplinary Action:** Sanctions will be issued in accordance with the School Behaviour Policy, making it clear that discriminatory abuse is entirely unacceptable.
- **Targeted Education:** The perpetrator will work with a trained staff member to complete targeted educational sessions focused on equality, diversity, and the real-world impact of their words and actions.
- **Restorative Practices:** Once the victim feels comfortable and safe, skilled staff may facilitate restorative discussions to help the perpetrator understand the harm they caused and take genuine accountability.

3. Leadership and Governance Accountability

- **Frequency Monitoring:** The DSL will regularly analyse CPOMS data to identify any recurring patterns, hot spots, or spikes in specific types of prejudice-based abuse.
- **Reporting to Governors:** The Headteacher will provide regular, anonymised reports of all hate incidents and prejudice-based abuse to the Governing Body, detailing the school's actions and the outcomes.
- **Wider Community Awareness:** Where incidents reflect wider community-based tensions, the school will collaborate with local community leaders, the local authority, and the police to reinforce safety and cohesion.

Child Abuse Linked to Faith or Belief (CALFB) Policy (2026/27)

Section 1: Definition & Context

Vernham Dean Gillum's Primary School is committed to protecting children from **Child Abuse Linked to Faith or Belief (CALFB)**. This occurs when a child is subjected to physical, emotional, or sexual abuse, or severe neglect, because of a parent's or carer's belief in:

- **Spirit possession** (the belief that an evil force has entered the child and controls them).
- **Witchcraft** (the belief that the child is a "witch" or has the power to cast spells or cause misfortune to others).
- Other concepts such as the **"evil eye," djinns, kindoki, dakini, or ritualistic harm**.

> ⚠ **The Key Safeguarding Rule:** While we respect religious and cultural diversity, we never tolerate child abuse or cruelty. The abuser may genuinely believe they are helping the child or performing a necessary religious duty—**holding such a belief is never a defence or a mitigating factor for abuse**.

Section 2: Vulnerability Triggers (Why a Child is Targeted)

Perpetrators often target a child because they perceive them as being "different" or blame them for misfortune within the family (e.g., financial distress, illness, or divorce).

Staff must maintain professional curiosity if they observe these specific risk factors combined with a weak parent-child attachment:

- **Physical or Learning Disabilities:** Including autism, ADHD, or visible physical impairments.
- **Medical Conditions or Ailments:** Persistent bed-wetting, severe nightmares, epilepsy, or chronic physical illness.
- **behavioural Traits:** Standing out as exceptionally disobedient, independent, or highly gifted/unusually talented.
- **Family Structure Changes:** A step-parent joining the household, a parent or child moving from overseas, or a difficult multiple pregnancy.

Section 3: Specific CALFB Indicators (What Staff Must Look For)

While general signs of physical and emotional neglect apply, CALFB often presents with highly unique and distinct physical indicators:

- **Inappropriate or Minimal Clothing:** Believing that demons or evil spirits are represented by fire, carers may dress the child in minimal clothing or leave them exposed to cold to "cool down" and extinguish the spirit.
- **Hidden Scarring or Cuts:** Significant scarring, cuts, or physical markings, specifically on the child's back or torso, which are kept hidden under clothing (often associated with "bloodletting" or "Hijama" practices).
- **Restraint Markings:** Bruising or red marks around the wrists, ankles, or neck, indicating the child is being physically held or tied down during "exorcism" or deliverance rituals.
- **Unexplained Illness/Poisoning (Magical Drinks):** Carers may force the child to consume "magical drinks" or special "holy water" to cleanse them. These drinks are frequently laced with excessive salt mixtures, herbal concoctions, or sedatives (e.g., cannabis, GHB) to make the child appear compliant.
- **Expressive Language or Disclosures:** The child may directly report that they are "evil," "bad," or "bringing bad luck to the family," or explicitly mention undergoing "deliverance," "prayers," "exorcisms," or "Ruqyah" to get the devil beaten out of them.

Section 4: Immediate Action and Referral Protocol

Any concern regarding CALFB must be treated as a **critical, immediate safeguarding concern**. The following response pathway must be followed without delay:

1.

1. Alert Identified
Staff member spots CALFB alerting sign

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2. Report to DSL
Report immediately to the DSL (verbally and on CPOMS)

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3. High-Priority External Referral
DSL makes an immediate referral to Children's Social Care (Hampshire MASH)

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CRITICAL MANDATE: No Parental Contact
DO NOT notify, challenge, or seek explanation from the parents/carers prior to referral.

2. **Immediate Verbal Report:** Staff must verbally alert the DSL immediately, followed by a formal CPOMS report logged within the hour.
3. **No Parental Contact:** Due to the extreme risk of rapid escalation (the family may take the child out of the country, speed up a dangerous exorcism ritual, or inflict severe physical punishment), **under no circumstances must staff discuss suspicions with the parents or seek their consent prior to a referral**.
4. **HIPS Escalation:** The DSL will make an immediate referral to **Hampshire Children's Social Care (MASH)**. The school will actively support the police and paediatric teams during the subsequent multi-agency strategy meetings.

Serious Violence, Gangs, and Youth Exploitation Policy (2026/27)

Section 1: The Serious Violence Duty & The School’s Legal Role

Vernham Dean Gillum’s Primary School operates in strict accordance with the statutory **Serious Violence Duty** and the **HIPS Multi-Agency Safeguarding Procedures**.

We recognise that serious youth violence, gang association, and Child Criminal Exploitation (CCE) are severe safeguarding harms. Both the victims and the perpetrators of youth violence are viewed through a trauma-informed lens as children in need of protection.

Section 2: Primary School Risk Indicators & Exploitation Warning Signs

While serious violence is statistically more visible in secondary education, we understand that grooming, manipulation, and early-stage criminal exploitation frequently begin in primary school. Staff must maintain professional curiosity and look out for the following warning signs:

Category	Indicators & Risks
Vulnerability Risks (KCSIE 2026)	• Pupils on part-time timetables or repeatedly removed from class. • Children with a history of family offending or domestic abuse. • Persistent, unexplained absenteeism (unauthorised truancy).
Behavioural Indicators of Exploitation	• The child is suddenly in possession of unexplained money, expensive clothing, or multiple mobile phones. • Significant, sudden changes in behaviour, language, or peer groups. • The child uses gang-affiliated terminology, symbols, or gestures. • The child is observed being met or dropped off by older peers/adults not known to the family.

Section 3: Mandatory Reporting of Weapon Concerns

🚨 **Mandatory Safeguarding Directive (KCSIE 2026):** If any staff member has a concern, suspicion, or receives information that a child is **carrying, storing, or using a weapon** (either inside or outside of school), they must report this **immediately to the DSL**.

- **Risk Assessment and Safety Planning:** Upon receiving a weapon-carrying or gang-association concern, the DSL must immediately conduct a formal risk assessment and implement an **Individual Safety Plan** for the child and the wider school community.
- **Active Monitoring of Risk Zones:** We recognise that children are at their highest risk during specific transition points of the school day (e.g., immediately after school, around local transport hubs, or near local shops). The school coordinates with local police and community safety partners to ensure a visible, protective adult presence during these times.

Section 4: Our Strategic Actions

To protect our pupils and build a culture of safety, the Federation implements a multi-tier approach:

Strategy Stage	Key Action
Preventative Curriculum	Resolving conflict, identifying healthy vs. unhealthy friendships, and peer-pressure.
Robust Early Intervention	Referrals to Early Help, Youth Offending Teams, or local Violence Reduction Partners (VRP).
Secure Transitional Wraparound	DSLs must personally coordinate transition to Alternative Provision/PRUs to prevent drop-off.

1. Preventative Curriculum

- **Conflict Resolution:** Resolving conflict and managing peer pressure is woven directly into our PSHE curriculum.
- **Gender-Based Violence & Misogyny:** We actively challenge aggressive, misogynistic, or misandric behaviours that frequently lay the groundwork for gang recruitment and violent hierarchies.

2. Early Intervention & Partnership Working

- **Multi-Agency Referrals:** Where concerns of CCE, county lines, or youth violence are identified, the DSL will make a timely referral to the **Hampshire MASH**, the **Youth Offending Team (YOT)**, or local **Violence Reduction Partners (VRP)**.
- **No Victim-Blaming:** We recognise that children caught in criminal networks are often coerced, manipulated, or groomed without fully understanding they are being abused. They will be supported, not automatically criminalised, while maintaining clear behavioural boundaries.

3. Safe Transitions (Exclusion/PRU Safeguard)

- **Continuity of Care:** When a pupil with a history of serious violence, behavioural concerns, or gang exposure is suspended, excluded, or transitions to Alternative Provision/a Pupil Referral Unit (PRU), **the DSL must personally contact the receiving setting's DSL**.
- **Active Handover:** The DSL will transfer all safeguarding files securely and hold a direct handover meeting to ensure that critical safety plans and continuous pastoral protections are maintained without a gap in coverage.

Private Fostering Safeguarding Policy (2026/27)

Section 1: Statutory Definition (The "Close Relative" Rule)

Under the *Children Act 1989*, a **Private Fostering** arrangement occurs when a child under the age of 16 (or under 18 if the child is disabled) is cared for, and provided with accommodation, by an adult who is **not a close relative**, for a continuous period of **28 days or more**.

Relationship Status	Examples
Exempt (Close Relative)	Parents and legal guardians with Parental Responsibility (PR); Step-parents, grandparents, siblings, aunts, or uncles.
Classified as Private Fostering (Not a Close Relative)	Cousins, great-aunts, great-uncles, family friends, or neighbours; Parents of a boyfriend or girlfriend (e.g., teenagers cohabiting); Host families for international students / language school stays.

Section 2: Identifying "Hidden" Private Fostering (Staff Vigilance)

Because parents and carers frequently fail to notify the Local Authority of these arrangements (often through a lack of legal awareness), staff must maintain professional curiosity.

The DSL will investigate and act if any of the following indicators are observed:

- **Emergency Contact Discrepancies:** A pupil's emergency contacts are updated to adults with different surnames who are referred to as "Auntie" or "Uncle," but are discovered to be family friends or distant relations.
- **Unclear Living Arrangements:** A pupil mentions in class, writing, or drawing that they are no longer living with their parents, or frequently changes addresses.
- **Absence of Parental Consent:** An adult who does not hold parental responsibility attempts to sign school permission slips, medical consent forms, or attend parents' evenings without legal documentation.
- **International Student Arrivals:** Pupils arriving from overseas to study in the UK who are living with host families or guardians.

Section 3: School Action and Escalation Protocol

If a member of staff suspects or becomes aware of a private fostering arrangement, the following mandatory steps must be executed:

1.

Step 1: Parental Responsibility Audit
DSL conducts initial check on Parental Responsibility (PR) status and verifies who the child lives with and their legal tie.

↓

Step 2: Parent & Carer Engagement
Inform parents and carers of the legal duty to report the private fostering arrangement to the Local Authority.

↓

Step 3: Mandatory Local Authority Notification
DSL submits formal notification to Hampshire Children's Social Care (MASH) within 48 hours.

↓

Step 4: Specialist Risk Screening
Screen for wider potential safeguarding risks, such as Modern Slavery or Child Trafficking.

2. **PR Audit:** The DSL will immediately verify who has parental responsibility (PR) for the child on our school management system.
3. **Parent/Carer Engagement:** The DSL will contact both the parents and the temporary carers to inform them of their legal obligation to notify the Local Authority. The DSL will make it clear that **the school is legally mandated to report the arrangement directly**.
4. **Local Authority Notification:** The DSL will notify **Hampshire Children's Social Care (MASH)** of the arrangement within **48 hours** of discovery, regardless of whether the parents or carers have consented to or made the report themselves.
5. **Specialist Risk Screening (Exploitation & Trafficking):** During the referral process, the DSL will assess if there are indicator signs of **child trafficking or modern slavery**. This is especially critical for children arriving from overseas who have minimal or no direct contact with their birth parents.

Section 4: School-Arranged Homestays and Exchanges

- **Regulated Activity:** Where the school arranges homestays or exchange visits within the UK (where host families provide 24-hour care and accommodation to a visiting child), this is classified as a **regulated activity**.
- **DBS Mandate:** The school will ensure that **Enhanced DBS checks** are obtained for all adults residing within the host family home.

- **The 28-Day Threshold:** If any school-sponsored exchange or homestay program is scheduled to last **28 days or longer** for a pupil under 16 (or under 18 if disabled), the school will formally notify the Local Authority under Private Fostering regulations prior to the placement commencing.

Online Safety: Filtering and Monitoring Addendum (2026/27)

Section 1: Our Technical Setup with Harrap ICT

At Vernham Dean Gillum's Primary School, we work in active partnership with our IT support provider, **Harrap ICT**, to deliver robust, multi-layered online protections that align with the DfE's Filtering and Monitoring standards.

FILTERING (Content Control)

- Handled via WatchGuard WebBlocker & Firewalls (managed by Harrap).
- Blocks illegal and age-inappropriate URLs, keywords, and categories.

MONITORING (Device Supervision)

- Managed via physical supervision and classroom monitoring software (SENSO).
- Active alerts and screen monitoring across our fleet of Chromebooks.

⚖️ **The Balance of Risk:** We recognise that no filtering software is 100% effective. "Over-blocking" our system can stifle learning and prevent children from developing vital digital literacy. Our leadership team, alongside Harrap ICT, continuously assesses the system to maintain a healthy balance between online safety and educational utility.

Golden Rules for Staff & Chromebook Fleet Management

Because our primary schools utilise a significant fleet of **Chromebooks** on a daily basis, strict operational controls must be maintained:

- **The Unsupervised Access Ban: No child must ever have unsupervised access to an internet-connected device.** Chromebooks must only be used under the direct, active supervision of a staff member.
- **Prompt Device Shutdowns:** Chromebooks must be closed or safely stored away immediately after an assigned learning task is complete to prevent unmonitored browsing.
- **Vigilant Screen Awareness:** When Chromebooks are active in the classroom, staff must position themselves to maintain line-of-sight visibility of student screens.

Reporting & Escalation Pathway

When an online safety incident occurs, staff must bypass "troubleshooting" and follow this direct escalation route:

1.

Inappropriate Content Encountered	Required Actions
By a Child in Class	• Close/minimise screen immediately. • Reassure child (no victim-blaming). • Log on CPOMS within the hour. • Notify the DSL verbally.

Inappropriate Content Encountered	Required Actions
By a Staff Member	• Log URL and context. • Do not attempt to re-access. • Send details to DSL & Harrap. • Harrap updates WatchGuard block.

2. **If a child accesses an inappropriate site/app (accidentally or deliberately):**
    - Instruct them to close or turn over the device immediately.
    - Reassure the child (ensuring they do not feel blamed for accidental exposure).
    - Log the details on CPOMS and verbally notify the DSL.
3. **If a staff member encounters concerning content on the network:**
    - Report the URL and context to the DSL immediately.
    - The DSL will coordinate with **Harrap ICT** to ensure the WatchGuard filtering criteria are updated and blocked across the Federation network.

Disqualification under the Childcare Act 2006

Statutory Framework & Scope

Under **Section 75 of the Childcare Act 2006** and the **Childcare (Disqualification) Regulations**, individuals who are disqualified under the regulations are legally prohibited from:

- Providing relevant childcare provision.
- Being directly concerned in the management of such provision.

At Vernham Dean Gillum's Primary School, the staff members who fall "in scope" of these regulations are defined below:

EARLY YEARS PROVISION (Birth to 1st September following 5th birthday)

- Includes all Nursery and Reception staff (teachers, TAs, LSAs).
- Includes breakfast club, lunchtime, and after-school care staff supervising children in this age range.

LATER YEARS PROVISION (Children above Reception but under age 8)

- Applies ONLY to childcare provided outside normal school hours (e.g., wrap-around care, breakfast clubs, after-school care).
- Does NOT apply to daytime education or co-curricular clubs (like the school choir, sports teams, or curriculum catch-up sessions).

MANAGEMENT ROLES

- Anyone directly involved in managing these provisions (including the Headteacher, relevant SLT members, and wrap-around care managers).

Disqualification Criteria

A person is automatically disqualified from working in these provisions if they meet any of the following criteria:

1. **Inclusion on the DBS Children's Barred List** (which is a separate, immediate disqualifier).
2. **Specific Criminal Convictions/Cautions:** Being found to have committed certain violent or sexual criminal offences against children or adults.

3. **Care Orders:** Being subject to certain orders made in relation to the care of children (such as having a child placed in care or removed from their custody).
4. **Registration Refusal/Cancellation:** Having a childcare, childminder, or children's home registration refused or cancelled (unless solely for non-payment of fees).
5. **Overseas Equivalents:** Having committed an offence overseas that would have resulted in disqualification had it been committed in the UK.

The "Association" Rule (Schools Excluded)

⛔ **GDPR & Legal Compliance Notice:**

Schools **must not** ask staff or applicants about, or take into account, any offences committed by members of their household. The "Disqualification by Association" rule **does not apply to school settings**. Staff are only assessed on their **own** conduct, convictions, and suitability.

School Declaration & Action Protocol

To ensure full compliance, Vernham Dean Gillum's Primary School enforces the following operational protocol:

- **Annual Self-Declaration:** All staff members working within Early Years, wrap-around care (for under-8s), or managing these provisions must complete an annual Childcare Disqualification Self-Declaration Form.
- **Duty to Disclose:** Staff have a continuous contractual duty to notify the Headteacher **immediately** if their circumstances change in any way that would trigger a disqualification criteria.
- **Waiver Application:** If a staff member becomes disqualified, they must immediately cease working in the relevant provision. They may apply to **Ofsted** for a formal waiver.
- **Risk Management:** While a waiver is being processed, the school will implement strict risk management plans (which may include temporary redeployment to non-childcare roles out of scope of the regulations). If a waiver is refused, we will seek immediate counsel from our HR provider and the Local Authority Designated Officer (LADO).

Transporting Pupils in Private Vehicles

Distinguishing Informal vs. Formal Arrangements

At Vernham Dean Gillum's Primary School, we maintain a strict legal distinction between different travel arrangements:

- **Informal Arrangements (Out of Scope):** Private travel arranged directly between parents (e.g., carpooling for after-school clubs, playdates, or weekend sports) with no school involvement. **The school accepts no liability or safeguarding responsibility for informal arrangements.**
- **Formal Arrangements (In Scope):** Any transport arranged, requested, or facilitated by school staff to transport pupils to off-site visits, sporting fixtures, or educational events. **These formal arrangements must strictly adhere to the protocols below.**

Mandatory Driver & Vehicle Checks

Before any staff member, parent, or volunteer is authorised to transport pupils in a private vehicle, they must complete our **Private Vehicle Registration Form** and submit the following documents to the school office for annual verification:

REQUIRED DOCUMENTATION & STANDARDS

- Driving Licence: Full, valid UK licence (verified via DVLA check)
- Must have fewer than 6 penalty points.

- MOT & Tax: Vehicle must be roadworthy with valid, active MOT and tax (checked by school via the GOV.UK vehicle enquiry system)
- Insurance Cover:
    - Staff: Must hold "Business Use" cover on their policy.
    - Volunteers/Parents: Must confirm with their insurer that "volunteer driving for school activities" is covered under their policy

Child Car Seats & Road Safety Law

In strict compliance with UK road traffic laws, the driver is legally responsible for ensuring all passengers are safely secured:

- **Seat Belts:** No vehicle may carry more passengers than it has working seat belts. Every child must have their own designated seat belt.
- **Booster Seats:** Any child under **135cm tall or under 12 years of age** must use an appropriate child car seat or booster seat.
- **Parental Provision:** For formal trips, parents of children requiring booster seats must provide their child's own labelled booster seat on the morning of the trip. The driver must ensure it is fitted correctly before departing.
- **Front Seat Restriction:** Pupils must only travel in the rear passenger seats. **No pupil is permitted to travel in the front passenger seat**, with the sole exception of the driver's own child.

Safeguarding & Child Protection Protocol

To safeguard both children and adults against allegations of abuse or professional misconduct, we enforce strict seating and supervision rules:

- **The "Lone Adult" Rule:** To avoid unsupervised 1-to-1 situations, a single staff member or volunteer must **never** travel alone in a private car with a single, unrelated pupil.
- **Minimum Occupancy:** There must always be at least **two adults** in the vehicle, OR the driver must be transporting **at least two or more children**.
- **Medical & Behavioural Needs:** Pupils with significant medical needs (e.g., severe allergies requiring EpiPens, severe asthma) or complex behavioural needs must not be transported in parent or volunteer private cars. They must travel in a school-approved minibus or coach accompanied by trained staff.

Online Safety: Taking, Using, and Storing Images Policy

Hardware Security & Local Device Controls

To prevent the unauthorised capture, leakage, or loss of pupil imagery, Vernham Dean Gillum's Primary School enforces strict boundaries on the physical devices used to capture media:

- **School-Owned Devices Only:** Under no circumstances may any staff member, volunteer, or visitor capture images or videos of pupils using privately owned equipment (e.g., personal smartphones, personal tablets, or personal cameras).
- **Authorised School Equipment:** All school-related photography and videography must only be captured on school-provisioned devices (e.g., school iPads, school-registered digital cameras, or school Chromebooks).
- **Centralised Storage:** Images must be uploaded directly to the secure school network or approved cloud tenant as soon as practical. Once verified as uploaded, they must be permanently deleted from the capturing device's local storage. No student images may be saved to personal cloud backups.

Consent and the "Identifiable" Threshold

In alignment with data protection laws and the right to privacy, the school manages consent systematically:

CONSENT MAP

- IDENTIFIABLE (Face visible, high detail, school uniform badge): Requires active, signed parental consent before taking or publishing
- NON-IDENTIFIABLE (Taken from behind, blurred faces, hands-only): Explicit consent is not legally required under GDPR, but alternative angles are prioritised to protect anonymity.
- **Duration of Consent:** Parental consent is sought upon a pupil's registration and is maintained for the duration of their time at the school. Parents and carers reserve the right to withdraw or modify this consent at any time in writing.
- **Pupil Autonomy:** Recognising their growing rights under the UN Convention on the Rights of the Child, pupils who are old enough and possess the capacity to make their own decisions will have their personal wishes respected and should give their own consent alongside parental consent.
- **The Exit Rule (Retention):** Once a pupil or staff member leaves Vernham Dean Gillum's Primary School, all identifiable photographs featuring them will be removed from active school publications, the website, and social media feeds within 30 days, unless specific, written, long-term archiving permission has been granted.

Advanced Online Security & Technical Protections

To protect our community from sophisticated modern digital threats—such as web-scraping, unauthorised sharing, and the manipulation of student images into AI-generated Child Sexual Abuse Material (AI CSAM)—the school adheres to strict data minimisation practices:

- **Anonymity:** Full names or identifiable personal information (e.g., class groups, home locations, hobbies) must never be published alongside a child's face.
- **Alternative Angles:** Staff are encouraged to use over-the-shoulder perspectives, distant group shots, or blurred imagery in place of close-up, face-on photography, videography, or livestreams.
- **Metadata Removal (Exif):** All digital metadata (which can reveal GPS coordinates, device details, and precise timestamps) must be automatically or manually stripped from image files before they are uploaded to public-facing platforms.
- **Visual Immunisation:** Where practical, the school will downscale image resolutions, apply distinct watermarks, or utilise digital "immunisation" tools to disrupt malicious AI scanning and manipulation software.

Safeguarding & Incident Response Protocol

If a pupil or staff image is found to have been compromised, altered via AI, shared without consent, or targeted for blackmail/sextortion, staff must act immediately:

🚨 **SCHOOL INCIDENT PROTOCOL: IMAGE MISUSE & ABUSE**

1. **Contain & Escalate:** Immediate Action.
    a. Preserve all digital evidence (do not delete the source communications). Remove public access to the compromised original file on all school channels. Notify the DSL immediately.
2. **Do Not Engage:** No Ransoms.
    a. If approached with extortion or blackmail demands, do not engage, respond, or pay any demands.
3. **Report It:** Statutory Reporting.
    a. Report AI-generated CSAM or blackmail threats immediately to the local Police (999 if a minor is in immediate risk of harm). Support minors in using the Childline/IWF 'Take It Down' tool to scrub images from the web.
4. **Support & Prevent:** Follow-Up & Care.
    a. Prioritise the victim's psychological wellbeing. Coordinate supportive communication with families, and conduct an immediate security audit of school-wide media storage.

Appendix: Mobile Phones and Personal Smart Devices

1. Pupil Devices

- **Mobile-Free Environment:** The Federation operates a strict mobile-free policy for all pupils throughout the school day, including wrap-around care, break times, and extra-curricular activities.
- **Storage and Collection:** If a pupil needs to bring a mobile phone or smart device to school for safety during their journey to and from school, the device must be powered off upon arrival and handed directly to their class teacher. Devices will be stored securely and returned at the end of the day.
- **Prohibited Devices:** Smartwatches with cellular capabilities, image recording, or messaging functions must not be worn in school.
- **Unauthorised Use:** If a pupil is found with an unauthorised device, it will be confiscated immediately and placed in secure storage until a parent/carer can collect it.
- **Search and Confiscation:** In line with DfE guidance, staff have the authority to search for and confiscate personal devices if there is reasonable suspicion that the device has been used to breach school rules, take unauthorised photos/videos, or facilitate online harm/bullying.

2. Staff Personal Devices

- **Personal Use:** Staff may only use personal mobile phones, smartwatches, or tablets for personal matters during designated break times and strictly away from areas where children are present (e.g., in staffrooms).
- **Photography and Media:** Staff must never use personal devices to photograph, record, or film pupils under any circumstances. All media must be taken using official school-issued devices.
- **Contacting Families:** Staff must never use personal devices to contact parents, carers, or pupils. School landlines or official school email accounts must be used for all communication.

3. Visitors, Volunteers, and Contractors

- **Device Handling:** All visitors, supply staff, and volunteers must keep personal devices switched off (or on silent) and stored out of sight in main office areas or designated staff spaces.
- **Restricted Areas:** Personal devices must not be used in classrooms, communal spaces, or outdoor play areas while pupils are on site.
- **Photographs/Videos:** Visitors are strictly prohibited from taking photos or videos of pupils or school activities on their personal devices unless explicit permission has been granted by the Headteacher/DSL.

Policy Links: This appendix should be read alongside our *Online Safety Policy*, *Staff Code of Conduct*, *Behaviour Policy*, and *Taking and the Use and Storage of Images Policy*.

📞 Essential Helplines & Reporting Tools

Target Audience	Tool / Helpline	Purpose
Under 18s	Report Remove (Childline/IWF) & Take It Down (NCMEC)	Confidential removal of underage intimate images.
Over 18s / Staff	Stop NCII & Revenge Porn Helpline	Removal of adult non-consensual intimate images.
School Staff	Professionals Online Safety Helpline & Stop It Now	Dedicated advisory and emotional support for professionals.

Emergency	Local Police Force / Call 999	For immediate risks or reporting criminal image creation.

Appendix: Summary of Policy Changes (2026/27)

This appendix provides a comprehensive summary of the legislative and procedural updates implemented to transition from the 2025/26 policy baseline to the 2026/27 statutory framework, ensuring full audit compliance with Keeping Children Safe in Education 2026.

Summary of Policy Changes (2026/27)

Area of Change	2025/26 Baseline (Old)	2026/27 Updated (New)
Legislative Context	Cited KCSIE 2025, GDPR, DPA 2018.	Updated to KCSIE 2026; added Data (Use and Access) Act 2025; integrated EYFS Statutory Framework.
Child-on-Child Abuse	General definitions/bullying focus.	Explicit definitions for 'upskirting' & 'hazing rituals'; integrated KCSIE Part 5 frameworks.
Online Safety	General filtering/monitoring.	Mandated annual reviews + formal testing logs; includes 'livestreams' & generative AI risks (deepfakes).
Staff Induction	General safeguarding training.	Mandatory induction briefing on Childcare Disqualification Regs; training covers filtering/monitoring roles.
Governance	Oversight as 'general practice'.	Formal requirement for filtering/monitoring test logs to be reported to and noted by the Governing Body.
Safeguarding Vulnerabilities	Standard vulnerability lists.	Added 'children affected by parental offending' (prisoners' children); explicit absenteeism response.
Terminology	'Victim' as default label.	Shifted to child-centred, preferred terminology.

Area of Change	2025/26 Baseline (Old)	2026/27 Updated (New)
Referral Protocols	General Family Help process.	Clarified referral levels (Targeted Early Help vs. Statutory Section 17/47).

This document is now aligned with all September 2026 statutory requirements.