



Pownall Hall School

Child Protection and Safeguarding Policy

This is a whole school policy; it refers to and includes EYFS, after-school care and holiday clubs held on our premises.

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1. Introduction

Pownall Hall School is committed to a strong culture of safeguarding, ensuring that all staff embrace the concept of “it could happen here” and that they recognise that safeguarding is everyone’s responsibility.

We are fully committed to creating a culture of vigilance. We expect everyone who works in and visits our school to share this commitment. We encourage staff, pupils, and visitors to report anything that concerns them, and we will always act in the best interest of the child.

Our pupils are taught how to stay safe, including when online, and to recognise when they may be at risk. We ensure our pupils know how to get help when they need it. In line with the latest Working Together to Safeguard Children, we place importance on contextual safeguarding and consider risks in our local community when assessing the safety of our pupils.

The latest version of this policy is available on the school website and upon request. It has been completed in consultation with all school staff and governors and will be reviewed regularly, at least once a year.

2. Equality Statement

Pownall Hall School is committed to co-education and aims to provide a caring, disciplined, safe and secure family environment, where all pupils are enabled and encouraged to maximise their academic, sporting, musical and creative potential.

The School aims to instill traditional values of courtesy, good manners, mutual respect, tolerance and compassion in its pupils and help them develop self-discipline and good working habits for the future. The all-round personal development of each and every pupil lies at its heart.

Pownall Hall School is committed to creating an environment which will promote equality of opportunity for all members of its community including students, staff, parents/carers and others working in partnership with it.

(from Pownall Hall School’s ‘Single Equality Scheme Policy’)

3. Definitions

In line with Keeping Children Safe in Education 2025, we define safeguarding as:

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

‘Children’ includes everyone under the age of 18.

4. Key contacts

Name	Role Contact details
Miss Katherine Lowther	Designated Safeguarding Lead - (DSL) Whole School klowther@pownallhallschool.co.uk
Mr David Goulbourn	Deputy DSL Whole School headmaster@pownallhallschool.co.uk
Mrs Victoria Hayton	Deputy DSL Whole School vhayton@pownallhallschool.co.uk
Mr Mike Erian	Deputy DSL/ Prep merian@pownallhallschool.co.uk
Mrs Georgia Flynn	Designated Safeguarding Lead for the EYFS gflynn@pownallhallschool.co.uk Named Person for Looked After Children and previously Looked After Children
Miss Charlotte Holleran	Deputy DSL (SEND and All Year Round Provision) cholleran@pownallhallschool.co.uk
Miss Olivia Morton	Deputy DSL/ EYFS (all year round) omorton@pownallhallschool.co.uk
Mrs Victoria Jackson	Deputy DSL (Holiday Quest) vjackson@pownallhallschool.co.uk
Miss Jessica Pattison	Deputy DSL (Holiday Quest) jpattison@pownallhallschool.co.uk
Miss Alexandra Simmonds	Safeguarding governor asimmonds@pownallhallschool.co.uk
Cheshire East	Cheshire East Consultation Service (ChECS) 0300 123 5012 (option 3) (Mon-Thurs 8:30am – 5pm or Fri 8:30am – 4:30 pm) 0300 123 5022 (Out of Hours Emergency Team)
Cheshire East	Safeguarding and Quality Assurance Child Protection Team / Cheshire East Consultation Service 0300 123 5012
Cheshire East	Children's Assessment Team (Cheshire East Children's Social Care Team)
Cheshire East	<u>LADO Team: lado@cheshireeast.gov.uk</u> 01606 288931 LADO Team 01270685904 lado@cheshireeast.gov.uk
Police	0854 458 0000; 999 (emergency); 101 (non-emergency)
OfSTED	0300 123 1231

Other Emergency Contact Numbers:**TAMESIDE Children's Hub:**

General Helpline: 0161 342 4101

Emergency out of hours: 0161 342 2222 TRAFFORD

MARAT (Multi-Agency Referral and Assessment Team):

General Helpline: 0161 912 5125

Emergency out of hours: 0161 912 2020

Stockport Safeguarding Unit and LADO:

General Helpline: 0161 217 6028

Emergency out of hours: 0161 718 2118

Stockport Channel Panel:

General Helpline: 0161 474 5657 (ask for the single point of contact for education)

Trafford First Response

General Helpline: 0161 912 5125

Emergency out of hours: 0161 912 2020

MASSH (Multi Agency Safeguarding and Support Hub):

General Helpline: 0161 217 6028

Emergency out of hours: 0161 718 2118

MANCHESTER Contact Centre: 0161 234 5001

CHILDLINE: 0800 1111**NSPCC Child Protection Helpline:** 0808 800 5000**Greater Manchester Police Public Protection Investigation Unit (PPIU):**

For consultation about crime-related safeguarding concerns:

stockport.ppiu@gmp.pnn.police.uk**Operation Encompass:**

Provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. Available 8am - 1pm Monday to Friday on 0204 513 9990.

Prevent:

Cheshire East referrals: 01606 362147, The local police force, 101 (the non-emergency police number) and the DfE dedicated telephone helpline and mailbox for non-emergency advice for staff and governors: 020 7340 7264 and counter-extremism@education.gsi.gov.uk

NSPCC FGM:General Helpline: 0800 028 3550 fgmhelp@nspcc.org.uk

Whistleblowing/ Staff allegations: 0800 028 0285

We are part of Cheshire East local authority. We follow the Cheshire East 'Safeguarding Children Partnership' multi-agency safeguarding arrangements put in place by the safeguarding partners. Further detail can be found here Cheshire East Safeguarding Children's Partnership (CESCP).

5. Roles and responsibilities

5.1 Designated Safeguarding Lead, EYFS Designated Safeguarding Lead and Deputies.

The DSL will:

- Take lead responsibility for safeguarding with the support of the Deputy DSLs and EYFS DSL.
- Be available during term time for staff to discuss any safeguarding concerns.
- Lead on referrals to local authority children's social care, the Channel Programme where there is a radicalisation concern, the DBS where relevant in relation to allegations of abuse made against staff, and where a crime has been committed to the Police as required with reference to the guidance 'NPCC- When to call the police'.
- Act as a source of support, advice and expertise for all staff.
- Act as a point of contact with the safeguarding partners and share information with them as required.
- Liaise with the Headteacher to keep them informed of issues, especially police investigations and ongoing enquiries under Section 47 of the Children Act 1989.
- Liaise with the case manager as required and the LADO for child protection concerns in cases which concern a staff member.
- Liaise with relevant staff in school, e.g. SENCO, Senior Mental Health Lead, attendance lead, online safety providers etc.
- Promote engagement with parents and/or carers in safeguarding and promoting the welfare of children.
- Take lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues of students and through identifying the impact these may have on attendance, engagement and achievement at school.
- Work with staff to ensure that the school knows the cohort of children who have or have had a social worker, their academic progress and attainment and maintain high aspirations for this cohort and support staff to enable these students to meet their potential.
- Ensure records are kept in line with good record-keeping practice as outlined in the latest Keeping Children Safe in Education.
- Ensure Child Protection (CP) files are transferred to new schools within 5 days, ensuring safe transit and confirmation of receipt.
- Ensure that this policy and safeguarding procedures are accessible to all new and existing staff, that this is reviewed at least annually and is available publicly.
- Liaise with local safeguarding partners to ensure that staff are aware of any training opportunities and the latest local policies.
- Update training every two years covering the content outlined in KCSIE and ensure any Deputy DSLs also renew this training.
- Update own knowledge and skills at least annually.
- Work to understand the views of students and encourage a culture of listening to students.
- Hold and share information in line with Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and the guidance around information sharing in KCSIE 2025.
- Adopt a sensible reasonable force policy which outlines the procedures we follow. Any physical restraint is down to the professional judgement of the staff concerned and is only permissible when a child is in imminent danger of inflicting injury either on himself/ herself or on another. Then, it is only as a last resort, when all efforts to diffuse the situation have failed. Another member of staff should, if possible, be present to act as a witness. All incidents of the use of physical restraint should be recorded in writing and reported immediately to the DSL who will decide what to do next. (Details on the use of physical restraint can be found in our Behaviour and Discipline Policy - 2b). Our approach complies with the DfE's guidance on Use of Reasonable Force (July 2013).

5.2 Governing body

- Review and approve this policy at each review and hold the headteacher to account over its implementation.
- Appoint a safeguarding governor to oversee safeguarding compliance and the effectiveness of this policy, and
- Ensure that any new member of staff is recruited following the procedure set out in the Safer recruitment policy.
- Ensure that the monitoring of the SCR occurs on a termly basis (monitoring cycle), by the Headmaster and the safeguarding governor.
- Read and understand Keeping Children Safe in Education, and review this guidance at least annually.
- Engage with safeguarding training, including training at induction, that equips the governing body with the skills to provide strategic challenge in relation to safeguarding.
- Review the filtering and monitoring system and processes to ensure compliance with Keeping Children Safe in Education.

5.3 All staff

- Receive appropriate safeguarding and child protection training including online safety which, amongst other things, includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring.
- Receive safeguarding updates regularly through staff meetings, emails, bulletins and Educare updates, and at least annually that provide the relevant skills and knowledge to safeguard children effectively.
- Understand the local Early Help process and staff's role in relation to it and the circumstances students may be in who might benefit from this as listed in Part 1 of KCSIE.
- Understand the process for making referrals to local authority children's social care and for statutory assessments under the Children Act 1989, especially Section 17 (children in need) and Section 47 (child protection) that may follow a referral, along with the role they might be expected to play in such assessments, for example supporting the safeguarding team with collecting information for enquiries or multi-agency meetings.
- Understand that the process for making referrals locally is by contacting the Cheshire East Consultation Service (ChECS) on 0300 123 5012, or 0300 123 5022 for the Out of Hours Emergency Team
- Know what to do if a child tells them they are being abused, exploited, or neglected and to maintain an appropriate level of confidentiality.
- Know not to promise a child that they will not tell anyone about a report of any form of abuse.
- Reassure victims that they are being taken seriously and assure them that they are not causing a problem by reporting.
- Be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/ or they may not recognise their experiences as harmful. This should not prevent professional curiosity and discussions with the DSL.
- Know the indicators of abuse and neglect and exercise professional curiosity and that such issues are rarely standalone ones.
- Be aware of extra-familial and/ or contextual risks which occur outside of the families e.g. sexual abuse, domestic abuse, criminal exploitation, serious youth violence, county lines and radicalisation.
- Be aware that technology is a significant component in many safeguarding and wellbeing issues and the risks young people face online.
- Know how to report concerns about safeguarding practices within the school via whistleblowing procedures or other means.

- All staff should be aware of the Early Years Foundation Stage Policy.
- Know how to report concerns if staff have a safeguarding concern, or an allegation is made about another member of staff (including supply staff, volunteers, and contractors) harming or posing a risk of harm to children through the following process:
 - Headteacher
 - Concerns about the Headteacher to the Chair of Governors
 - The ability to report directly to the LADO where there is a conflict of interest.
- All staff should read and understand Part 1, Part 4, Part 5, Annex A, Annex B and Annex F of Keeping Children Safe in Education 2025, and review this guidance at least annually. DSL, EYFS DSL, DDSLs, members of the 'safer recruitment' process, management, senior leaders, room leaders, or members of the Governing Body will be expected to read ALL of the KCSIE 2025, except Annex D.
- Attend and engage with induction training, including reading and understanding our:
 - o child protection policy
 - o behaviour policy and the measures taken to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying
 - o the staff behaviour policy/code of conduct
 - o Early Years Foundation Stage Policy
 - o safeguarding response to children who go missing from education
- All staff have opportunities to contribute to and shape safeguarding arrangements and the Safeguarding/ Child Protection Policy. The Policy is reviewed and updated annually, with an opportunity for staff to read and respond to revised versions immediately prior to the start of the new academic year in September. At this point the Policy is in a draft version and will be amended should there be a need to do so and where valid points are made by staff. Similarly, regular safeguarding staff meetings throughout the year provide staff with opportunities to recap and review safeguarding procedures so that our policy and its practices are constantly under scrutiny by those implementing them.

6. Responding to and recording concerns

When staff or visitors to the school have a safeguarding concern, they should promptly contact the DSL in person or, in their absence, a Deputy DSL. The DSL or a Deputy DSL will always be available in person on site, whether during term time or in the school holidays. Any member of staff should enter a safeguarding incident on CPOMS and alert the DSL of the relevant department. Visitors need to speak to a DSL or DDSL, who upload the visitor's written concern onto CPOMS.

Staff running the Holiday Club will record any safeguarding incidents, for children who are not pupils at Pownall Hall, on the written Record of Concern Form (see appendix 3) and notify the relevant DSL. The form will be shared with the child's school and a copy will be kept in the PHS safeguarding file.

All staff should know what to do if a child tells them they are being abused, exploited, or neglected and to maintain an appropriate level of confidentiality. All staff should know to act upon concerns about a child's welfare immediately.

All staff should be aware of the following when responding to concerns:

- All staff should know not to promise a child that they will not tell anyone about a report of any form of abuse.
- All staff should be able to reassure victims that they are being taken seriously and assure them that they are not causing a problem by reporting.
- All staff should be aware that children may not feel ready, or know how to tell someone that they

are being abused, exploited, or neglected, and/ or they may not recognise their experiences as harmful. This should not prevent professional curiosity and discussions with the DSL.

If a member of staff is concerned by verbal conversations, disclosures, or signs of abuse or neglect these should immediately be recorded in writing and passed to the DSL. If the member of staff is unsure, they should always speak to the DSL or a deputy regarding their concerns.

The DSL will then decide what action must be taken, which can include:

- Further pastoral support in school
- Conversation with the child's parent(s), or person with parental responsibility
- Referral for an Early Help assessment:
 - o Early Help Brokerage at Cheshire East Council:
ehblocalitysupport@cheshireeast.gov.uk
- Referral to children's social care:
 - o Cheshire East Consultation Services (ChECS):
 - 0300 123 5012 *option 3* (Mon-Thurs 8:30am – 5pm or Fri 8:30am – 4:30 pm)
 - 0300 123 5022 (Out of Hours Emergency Team)

If the DSL and deputies are not available, a staff member should not delay and should consider speaking to another member of SLT or contact local children's social care for advice or to make a referral. Any such action should be shared with the DSL as soon as is practically possible.

Parents should be aware that referrals can be made where there is suspected abuse or neglect by the school and that our concerns regarding a student will be shared. The school will always seek to share these concerns and the referral with parents first, unless to do so would put the child at greater risk of harm, where we are advised not to, or where it has not been practicable to.

Reporting and Recording concerns

In the event of a potential safeguarding disclosure or incident at Pownall Hall School, staff will record the details on CPOMS and alert the DSL or the relevant Deputy DSL.

Staff will provide a first-hand summary of their concern or detail of a disclosure they have received. They will use professional language and try to capture the incident as it took place, or as it was described to them. They will report all concerns in a timely fashion. The safeguarding team will ensure that any action taken, or outcome, is accurately recorded in line with good record-keeping guidance which should follow:

- o A clear and comprehensive summary of the concern
- o Details of how the concern was followed up and resolved, and
- o A note of any action taken, decisions reached and the outcome.

Students can confidently report concerns knowing that these concerns will be treated seriously, and that they can express their views and give feedback too. This can be done through a variety of means which include speaking to form teachers or any trusted adult within school, or via Worry Boxes (located in classrooms and around the school) if a child finds it difficult to initiate verbal discussion of a concern. Once a potential safeguarding concern or disclosure has been shared with the DSL or Deputy DSL, a decision will be made as to whether or not to refer to an external agency. A wider discussion between DSL and Deputy DSL(s) may take place.

7. Online safety

We recognise that the use of technology has become a significant component of many safeguarding issues, including child-on-child abuse. We recognise that children need to be safeguarded from

potentially harmful and inappropriate online material and the school's role within this. Online harms can include exposure to misinformation, disinformation and conspiracy theories, which may contribute to safeguarding risks such as radicalisation, exploitation or emotional harm. To address this, our school strives to:

- Have clear procedures in place to ensure the online safety of all staff and students
- Educate the school community in the safe and responsible use of online technology
- Set clear expectations for the use of online technology, including mobile phones.

Our approach to online safety is framed by four main areas of risk:

- content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying
- commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams.

We are also aware of the risks of misinformation, disinformation and conspiracy theories.

Disinformation is defined as the deliberate creation and spread of false or misleading content, such as: fake news. Misinformation is the unintentional spread of this false or misleading content.

To address the risks above, as a school we will:

- Teach students about online safety through computing and PSHE lessons and other relevant subjects
- Inform parents about what their child is being asked to do online by the school
- Train all staff on online safety, including filtering and monitoring
- Train all staff in online safety, including at induction

We have clear guidance for our school community on acceptable use of technology and the use of all electronic devices with imaging and sharing capabilities, and a behaviour policy that aligns with this. This includes our Taking, Storing and Using Images of Children Policy, E Safety and Acceptable Use Policy.

Filtering and monitoring

We use the DfE's [‘Plan technology for your school’](#) service to assess our filtering and monitoring arrangements and to inform our personalised approach to meeting the standards.

Pownall Hall School uses a Safe Search filter system called ‘Surf Protect’ and is monitored by Hi-Impact as a filtering and monitoring system. This filters and monitors for harmful or inappropriate content. This covers our school network and the following devices: class set of Chromebooks; class set of iPads; staff laptops.

The DSL has lead responsibility for understanding the filtering and monitoring systems and processes in place. The DSL and deputies monitor the effectiveness of this system through weekly reviews of reports sent to the Headteacher and the DSL. In the event of something serious being detected, the Headteacher and DSL would be alerted immediately via email. Further information is detailed in the E Safety policy.

The school takes care to not ‘over block’ content so that there are not unreasonable restrictions on

what students can be taught regarding online safety.

The processes we have in place have been informed by our risk assessment as required by the Prevent Duty.

The DfE has published filtering and monitoring standards which set out that schools should:

- Identify and assign roles and responsibilities to manage filtering and monitoring systems
- Review filtering and monitoring provision at least annually
- Block harmful and inappropriate content without reasonably impacting teaching and learning
- Have effective monitoring strategies in place that meet their safeguarding needs

We at Pownall Hall School have done the following in relation to this: clarified the role of the DSL and the wider SLT in regularly overseeing daily filtering and monitoring reports from Surf Protect; reviewed our filtering and monitoring provision with a view to doing so annually, prior the start of every new academic year; ensured that harmful and inappropriate content is blocked without impairing the effective teaching of online safety; familiarised the wider school community with our filtering and monitoring systems.

For more information on filtering and monitoring, parents and carers can contact the Headteacher, the DSL or the Safeguarding Governor. We also refer to the [DfE's guidance on the use of generative AI in education \(2025\)](#) to support our approach to online safety, digital literacy and filtering/monitoring practices.

Use of Artificial Intelligence (AI) in School

We recognise that emerging technologies, including Artificial Intelligence (AI), present both opportunities for learning and potential safeguarding risks for pupils, particularly younger children. These risks may include exposure to inappropriate or misleading content, data privacy concerns, over-reliance on technology, or the use of AI tools in ways that are not age-appropriate.

The school is committed to monitoring the use of AI within the curriculum and wider school environment. Staff will ensure that pupils' engagement with AI tools is guided, purposeful, and safe. Clear boundaries and age-appropriate restrictions are in place, and pupils are supported to develop digital literacy and critical thinking when interacting with AI systems.

We will continue to review and update our practice as technology evolves, to safeguard pupils effectively and to ensure AI is used responsibly and positively within our school community.

8. Whistleblowing

At Pownall Hall School, we recognise that adults working in a school may cause harm, including agency staff, visitors, and governors. Any concerns about a member of staff posing a risk of harm to children should immediately be referred to the Headteacher. These concerns could include where anyone working in the school has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child, or children, in a way that indicates he or she may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

Where there are concerns about the headteacher, these should be referred to our Chair of Governors, Mrs Eileen MacAulay via emacaulay@pownallhallschool.co.uk. Any concerns about the Chair of

Governors or any governor should be taken directly to the LADO via Cheshire East Consultation Service (ChECS) on 0300 1235912 or 0300 1235022 for the Out of Hours Emergency Team.

Any member of staff or volunteer with concerns about poor or unsafe practice and potential failures in our school's safeguarding regime should contact the NSPCC whistleblowing helpline via telephone (0800 028 0285) or email (help@nspcc.org.uk).

9. Children potentially at greater risk of harm

At Pownall Hall School, we recognise that children with social workers, or who have previously been under the care of social workers may potentially be at greater risk of harm and need further support. Children may need this support due to abuse, neglect, exploitation, or complex family circumstances. Our staff are aware that these students may face additional barriers to their attendance, learning or behaviour. We take these needs into account and liaise regularly with the relevant social worker to put appropriate support in place.

We also recognise that low or erratic attendance and Children Missing Education (CME) may be an indicator of abuse or neglect. All staff should be aware that children being absent from school, particularly repeatedly and/ or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities which may include abuse, neglect, sexual abuse, exploitation, child criminal exploitation, county lines involvement, mental health problems, risk of substance misuse, so called 'honour' based violence.

We know that early intervention is essential to help prevent the risks of a child going missing in the future. Our pastoral teams track attendance thoroughly, addressing concerns without delay and liaising with our Education Welfare Officer (the Headteacher) and Attendance Leads (Head of EYFS; Head of KS1; Deputy Heads of Prep) where needed.

We ensure that pupils who are expected to attend the school, but fail to take up the place or cannot be located, are referred to the local authority in line with local procedures and guidance such as Children Missing Education (DfE, 2016). The DSL will be aware of any students who may be considered CME and will work with the Attendance Lead/ Education Welfare Officer (EWO) to ensure any safeguarding concerns are reviewed, the advice of external agencies is sought, and local procedures are followed.

We also strongly encourage parents to supply us with two emergency contacts for their child, updating their contact details without delay if they are changed and share our procedures for how to notify the school of an absence with all parents. When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

Children who are, or are perceived to be, lesbian, gay, bisexual or transgender (LGBT) can be targeted by other children. Staff at school will work to reduce the additional barriers faced by such pupils and provide a safe space for them to speak out or share concerns with staff. LGBT inclusion will also be covered within our RSE curriculum.

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived to be lesbian, gay, or bisexual can be just as vulnerable. As a school, we recognise the importance of supporting pupils who may be questioning their gender identity. We take a cautious approach that considers the individual needs of each child, working in partnership with parents (other than in exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child). We also consider any available clinical advice and seek to address wider vulnerabilities. We endeavour to reduce the additional barriers faced by pupils in this group and to create a culture where all pupils feel able to speak out and share their concerns with members of staff. The DfE is expected to publish revised guidance on gender questioning children which is expected in late 2025. Once this guidance is published, we will review and reflect any relevant updates in our safeguarding policy.

Children with special educational needs (SEND), disabilities or certain health conditions can face additional safeguarding barriers when recognising abuse and neglect for reasons including:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- being more prone to peer group isolation than other children
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in overcoming these barriers.
- cognitive understanding- being able to understand the difference between fact and fiction in online content and then repeating the content/ behaviours in schools or colleges or the consequences of doing so.

At Pownall Hall School we identify students who may be more at risk of harm and take action to ensure their safety, including:

- close monitoring by form teachers
- regular phase-appropriate meetings (EYFS, Pre-Prep/ Prep)
- additional monitoring and mentoring where necessary, utilising our SEND coordinator, DSL, Deputy DSLs, Deputy Head Pastoral and/ or outside agencies. For further detail please refer to the SEND policy.

Children in Alternative Provision:

- **Vulnerable children:** Children in Alternative Provision (AP) often face complex challenges such as behaviourable issues, mental health problems, illness, or are at risk of exclusion, making them more vulnerable.
- **Duty of care:** Schools and local authorities retain a duty to safeguard and promote the welfare of children even when education is provided off-site or through a third party.
- **Risk Assessment:** comprehensive risk assessments must be completed for pupils placed in alternative provision, covering potential risks both within and outside the setting.

10. Operation Encompass

Pownall Hall School is part of Operation Encompass. Operation Encompass is a partnership between police and schools. One of the principles of Operation Encompass is that all incidents of domestic abuse are shared with schools, not just those where an offence can be identified. It operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead (or a deputy) in school, before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or school should make a referral to local authority children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website.

11. Records and information sharing

We recognise the importance of information sharing between practitioners and local agencies. We are proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care. The school is also part of Operation Encompass, a national initiative that ensures the police share information with the DSL about any domestic abuse incidents where a child has been present. This allows the DSL to provide timely support to the child by the start of the next school day. Our safeguarding records (paper copy up until October 2023 and on CPOMs since October 2023) include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved

- a note of any action taken, decisions reached and the outcome

We have due regard to the relevant data protection principles, understanding that the Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. At Pownall Hall School, we understand that the Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe.

In line with our mandatory duty, Pownall Hall School will notify our local authority if we become aware of any private fostering, to allow the local authority to check the arrangement is suitable and safe for the child. Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home.

12. Site safety

All staff members have a responsibility to ensure the buildings and school site are secure and to report any concerns that may occur. The identity of all visitors and volunteers coming into school is checked. All visitors (including parents and carers) are expected to sign in and out and to display a visitor's badge while on the school site. Any individual who is not known or identifiable will be challenged for clarification and reassurance by our staff. All visitors will be accompanied on site at all times.

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

13. Child-on-child abuse

In line with our strong commitment to safeguarding, at Pownall Hall School we believe that all children have a right to learn in a safe environment and take a whole-school approach to child-on-child abuse which includes preventative work, appropriate responses, and a zero-tolerance approach to abuse.

Our staff recognise that children of any age or gender can be capable of abusing other children, which can happen both inside and outside of school and online. This behaviour will be dealt with in line with our Behaviour and Anti-Bullying Policies, available on the school website.

This child-on-child abuse can include, but is not limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (also known as teenage relationship abuse)
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and harassment
- causing someone to engage in sexual activity without consent
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery)
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- upskirting which is a criminal offence
- initiation-type violence and rituals

All the above are examples of abuse and should never be tolerated or passed off as "banter", "just having a laugh", "boys will be boys" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

We recognise that the gendered nature of child-on-child abuse makes it more likely that girls will be victims and boys perpetrators, but all reports will be taken seriously. All concerns should be passed onto the DSL (or a deputy).

We minimise the risk of child-on-child abuse through our extensive PSHE (including RHE) curriculum and pastoral programmes, including assemblies and other key messages. All staff understand the importance of challenging inappropriate behaviours between peers and their role in preventing and responding to child-on-child abuse. Our staff understand that even if there are no reports of child-on-child abuse in our school, it does not mean child-on-child abuse is not happening - it may be the case that it is just not being reported. Children can report any child-on-child abuse by speaking to a chosen trusted adult in school. Depending on the age and preferences of the child, this is likely to be their form teacher, but children are encouraged to speak to whoever they feel most comfortable speaking to. We recognise that in some cases, children may speak to their parents first, in which case the initial reporting of child-on-child abuse may come from them. Where this is the case, an appropriate trusted adult would then speak to the child in school and the above procedure would then be followed. Once a disclosure has been made, the member of staff should alert the DSL or, in their absence, one of the Deputy DSLs who will then review the allegation and, should it be necessary, contact Cheshire East Consultation Service for advice. The Department for Education (DfE) is expected to publish revised statutory guidance on Relationships, Sex and Health Education (RSHE) later in 2025, once this is published, we will review the guidance and update our curriculum and safeguarding policy accordingly.

Any cases of child-on-child abuse will be thoroughly investigated, with the victim always being taken seriously and both the victim and alleged perpetrator given appropriate support. Support will take the child's wishes into account and may include increased pastoral support, a mentor, access to counselling and a referral to external services. We will liaise with the police and children's social care as necessary. Where there has been a report of sexual violence, an immediate risk assessment will be made, considering the needs of the victim, the alleged perpetrator, and our other pupils. All allegations of child-on-child abuse will be recorded in our safeguarding files.

In cases where nudes or semi-nudes have been shared, we follow guidance given to schools and colleges by the UK Council for Internet Safety (UKCIS): Sharing nudes and semi-nudes (December 2020). Pownall Hall School recognises that some children and young people may feel worried about their own, or someone else's sexual thoughts or behaviours. In such cases, pupils can access confidential advice and support through the Lucy Faithfull Foundation's Shore Space service: <https://www.shore.space>.

We record these incidents on CPOMs alerting the relevant DSL or DDSL.

This policy will be monitored by the Deputy Head, the DSL and the DDSLs, and is reviewed annually, or before if necessary.

Presented to Governors for approval September 2025

Signed:

Mrs Eileen MacAulay, Chair of Governors September 2025

Revision Log

Date	Changes Made	Version No
Sept 2023	New version created	V1
April 2024	Amendment and update	V2

Sept 2024	Amendment and update	V3
Sept 2025	Amendments: addition of types of online harmful exposure; refer to DfEs “Plan Technology for your School” and “Guidance on use of generative AI in Education”; add reference to gender identity; note we are part of Operation Encompass; detail our Due Diligence for Alternative Provision; reformat document to match font and layout of other PHS policies	V4

Next Review: July 2026

Appendix 1: Types of abuse and safeguarding concerns

KCSIE splits abuse into four main categories:

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

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

There are a number of other safeguarding concerns that ALL staff need to be aware of. These are detailed further in Annex B of KCSIE which all staff should read:

Child Criminal Exploitation (CCE): where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE can also occur through the use of technology.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions
- children who associate with other young people involved in exploitation
- children who suffer from changes in emotional well-being
- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late

County lines: a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas, using dedicated mobile phone lines or other form of "deal line". Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move (and store) drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Serious violence: where children are involved with serious violent crime. Indicators may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. There are a range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Child Sexual Exploitation (CSE): occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Indicators can be similar to the indicators of CCE, as well as:

- children who have boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant.

Modern Slavery and the National Referral Mechanism: Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Child abduction and community safety incidents: Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members, by people known but not related to the victim (such as neighbours, friends and acquaintances) and by strangers.

Cybercrime: criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Domestic abuse: The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

(a) physical or sexual abuse;

- (b) violent or threatening behaviour;
- (c) controlling or coercive behaviour;
- (d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- (e) psychological, emotional or other abuse.

Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse can have a serious, long lasting emotional and psychological impact on children and therefore children are now classified as victims and not merely witnesses where domestic abuse occurs. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Homelessness: being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. It should also be recognised in some cases that 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support.

'Honour-based' abuse (HBA): encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

Forced marriage: forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

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

Female Genital Mutilation (FGM): covers all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a **statutory duty** upon teachers to report to the police where they discover that FGM appears to have been carried out on a girl under 18. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students. If a victim discloses that FGM has been carried out on them, teachers must personally report to the police.

The duty does not apply in relation to at risk or suspected cases-these should be discussed with the DSL, in line with our referral process.

Potential risk factors may include:

- a female child is born to a woman who has undergone FGM
- a female child has an older sibling or cousin who has undergone FGM
- a woman/family believe FGM is integral to cultural or religious identity
- a parent or family member expresses concern that FGM may be carried out on the girl
- a girl talks about FGM in conversation, for example, a girl may tell other children about it
- being taken on a long holiday to country where FGM is prevalent

Radicalisation: We recognise that children are vulnerable to extremist ideology and radicalisation. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection.

Our school adheres to the Prevent duty and we have "due regard to the need to prevent people from being drawn into terrorism". We build pupils' resilience to radicalisation by providing a safe environment for debating controversial issues, promoting fundamental British values.

Staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying or advocating violence, especially to other faiths or cultures
- intolerance of difference, including faith, culture, gender, race or sexuality

As part of managing the risk of radicalisation, the School will ensure that any visiting speakers, regardless of who has issued the invitation, are suitable and appropriately supervised. In England the Prevent duty complements schools' other responsibilities for ensuring that speakers do not undermine the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs.

Mental health: All staff at Pownall Hall School are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Where staff have a mental health concern about a child that is also a safeguarding concern, they should contact the DSL or a deputy DSL and report and record their concerns in line with this policy (see section 5).

Appendix 2 -Allegations of abuse against staff

This appendix applies to all cases where it is alleged that a staff member, supply teacher or volunteer has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

We will deal with any allegation of abuse against a member of staff or volunteer quickly, in a fair and consistent way that provides effective protection for the child and supports the person who is the subject of the allegation. We recognise our duty of care to our employees and will provide effective support for anyone facing an allegation, including a named contact if the person is suspended. We will advise staff to contact their trade union representative and provide guidance with regard to additional support to which they may be entitled, such as occupational health or access to counselling.

Allegations of abuse against staff should be reported to the Headteacher. Where the concern is about the Headteacher this should be reported to the Chair of Governors, Mrs Eileen MacAulay. If the member of staff perceives there to be a conflict of interest, they can refer directly to the LADO. The contact details are available in the key contacts.

The following definitions will be used when determining the outcome of any investigation:

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

Initial consideration when dealing with an allegation

The headteacher or (where the headteacher is the subject of an allegation) the chair of governors should discuss the allegation immediately with the local authority designated officer. This discussion will consider the nature, content and context of the allegation and agree on a course of action. There may be situations when the case manager will want to involve the police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. Where there is no such evidence, the case manager will discuss the allegations with the designated officer in order to help determine whether police involvement is necessary. The case manager will inform the accused person about the allegation as soon as possible after consulting the designated officer. Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.

If the initial sharing of information leads to a decision that no further action is to be taken in regard to the individual facing the allegation or concern, this decision and a justification for it will be recorded by both the case manager and the designated officer, and agreement reached on what information should be put in writing to the individual concerned and by whom. The case manager will then consider with the designated officer what action should follow

both in respect of the individual and those who made the initial allegation. If the allegation is about physical contact, the strategy discussion or initial evaluation will take into account that school staff are entitled to use force to control or restrain children in certain circumstances.

Where it is clear that an investigation by the police or children's social care services is unnecessary, or the strategy discussion or initial evaluation decides that is the case, the designated officer will discuss the next steps with the case manager. In those circumstances, the options open to the school or college depend on the nature and circumstances of the allegation and the evidence and information available. This will range from taking no further action to dismissal or a decision not to use the person's services in future. Suspension will not be the default position: an individual should be suspended only if there is no reasonable alternative.

In some cases, further enquiries will be needed to enable a decision about how to proceed. If so, the case manager will discuss with the designated officer how and by whom the investigation will be undertaken. In straightforward cases, the investigation should normally be undertaken by a senior member of our staff. In other circumstances, the allegation will require an independent investigator.

Parents or carers of the child or children involved will be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or police or children's social care services need to be involved, the case manager will not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers. Parents or carers will be kept informed about the progress of the case. Parents will be reminded of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing. If parents or carers wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice.

If the accused person resigns, or ceases to provide their services, this will not prevent an allegation being followed up. We will ensure that a referral to the DBS is made, if the four criteria at the start of this appendix are met. We will also consider whether a referral to the Secretary of State is appropriate.

Following a criminal investigation or prosecution, the police should inform the school and designated officer immediately when a criminal investigation and any subsequent trial is complete, or if it is decided to close an investigation without charge, or not to continue to prosecute the case after the person has been charged. In those circumstances, the case manager will discuss with the designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed.

If the allegation is substantiated and the person is dismissed or the person's services are no longer used, or the person resigns or otherwise ceases to provide his or her services, the designated officer will discuss with the case manager and their personnel adviser whether the school or college will decide to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. In the case of a member of teaching staff, the case manager and personnel officer will discuss with the designated officer whether to refer the matter to the TRA to consider prohibiting the individual from teaching.

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the case manager will consider how best to facilitate this and consider how the person's contact with the child or children making the allegation can best be managed.

Allegations against a teacher who is no longer teaching will be referred to the police. Historical allegations of abuse will also be referred to the police.

Confidentiality

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

The case manager will take advice from the designated officer, police and children's social care services to agree the following:

- who needs to know and, importantly, exactly what information can be shared
- how to manage speculation, leaks and gossip
- what, if any, information can be reasonably given to the wider community to reduce speculation
- how to manage press interest if, and when, it should arise.

Record keeping and references

Details of allegations that are found to have been malicious will be removed from personnel records. For all other allegations, a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken, and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned. Records will be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

Cases in which an allegation was proven to be false, unsubstantiated or malicious will not be included in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious will also not be included in any reference.

Timescales

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

If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days.

If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days.

Suspension

Suspension will not be an automatic response when an allegation is reported: all options to avoid suspension will be considered prior to taking that step. Suspension will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal.

Based on assessment of risk, the following alternatives will be considered by the case manager before suspending a member of staff:

- redeployment within the school so that the individual does not have direct contact with the child or children concerned
- providing an assistant to be present when the individual has contact with children
- redeploying to alternative work in the school so the individual does not have unsupervised access to children
- moving the child or children to classes where they will not come into contact with the member of staff, making it clear that this is not a punishment and parents have been consulted; or
- temporarily redeploying the member of staff to another role in a different location, for example to an alternative school or work for the local authority

If immediate suspension is considered necessary, the rationale and justification for such a course of action will be agreed and recorded by both the case manager and the designated officer.

Supply staff

We will ensure any allegations against an individual not employed by Pownall Hall School, such as supply teachers, will be dealt with properly. We will not decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with our local authority designated officer to determine a suitable outcome. We will discuss with the agency whether it is appropriate to suspend the supply teacher. We will inform the agency of our process for managing allegations and invite the agency's human resource manager or equivalent to meetings as appropriate.

Learning lessons

At the conclusion of a case in which an allegation is substantiated, we will review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future.

Non recent allegations

Abuse can be reported no matter how long ago it happened. Where an adult makes an allegation to our school that they were abused as a child, the individual will be advised to report the allegation to the police. We will report any non-recent allegations made by a child to the LADO.

Low-level concerns

In line with Section Two of Part Four of Keeping Children Safe in Education, we recognise the importance of creating a culture of openness, trust, and transparency to encourage all staff to share low-level concerns with the right person so that they can be addressed appropriately. The purpose of our approach to low-level concerns is to ensure that our values are constantly lived, monitored, and reinforced by staff. Our values are outlined in more detail in our Staff Code of Conduct.

The term 'low-level' concern does not mean that the concern is insignificant, it means that a staff member, supply teacher or volunteer does not seem to have:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

A low-level concern covers any concern no matter how small, even if it is no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and;
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- being over friendly with children;
- having favourites;
- taking photographs of children on a personal mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
- humiliating pupils.

Such behaviour can exist on a spectrum. Our school's response to low-level concerns is an extension of our Code of Conduct. Staff are able to share their concerns confidentially in a simple and easy manner. It is imperative that where staff do have concerns, they share them as outlined in this policy, to support with building a culture of expected behaviour and promoting our school values.

Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported to the Headteacher.

The Headteacher will have oversight of all recorded concerns and has ultimate decision-making power in respect of all low-level concerns.

Any concerns about the Headteacher should be reported to the Chair of Governors.

All low-level concerns will be recorded in writing (see Appendix 6). Each record will include details of the concern, the context in which the concern arose, and action taken. The name of the individual who raised the concern should be noticed, but if that individual wishes to remain anonymous, that will be respected to the extent it is reasonably possible to do so.

Records will be kept confidential, held securely, and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation.

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or by referring to the LADO, where a pattern of behaviour moves from a low level concern to meeting the harm threshold. We will also consider whether there are wider cultural issues existing at the school that may have enabled the behaviour to occur. If this is found to be the case or a contributory factor, we may review our policies and deliver extra training where we consider this will minimise the events happening again.

Appendix 3: Safeguarding Record of Concern Form

RECORD OF CONCERN		
Name of Child: Class/Year Group:		
SEN status: Name of sibling/s:		
Name of person completing this form:	Role: Date of Concern:	Time of concern:
Nature of concern: Place of disclosure:		

Detail of concerns: <i>What you saw, what you heard, in the child's words. Include brief, accurate details and who else was present. Was it 1st or 2nd hand information? Distinguish between fact and opinion.</i>
<i>Continue on a separate piece of paper and attach as required</i>

Concern shared with:	Signature of referrer: Date of record: Time of record:
----------------------	---

For Completion by Designated Lead:

Agreed actions with basis for decision By whom	By when

Signature of Designated Safeguarding Lead:	Date of when actions are to be reviewed:
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Appendix 4: Safeguarding review/update for individual children

N.B. Please can this form be filled in by the member of staff who knows the child best/has the best relationship with the child, or filled in by the member of staff who was supporting the child most recently with their safeguarding worries.

- Please give the child as much time as they need to talk and find a quiet place where your conversation will not be interrupted.
- Ask open questions for clarification only. Do not interrupt the child. Nodding/sitting forwards, will show that you are listening. (Open questions: What happened? What did the person say? How are you feeling?)
- Try to make the child or young person feel safe and secure.
- Listen carefully without showing shock, surprise or anger. Stay calm and be patient.
- Record what has been said as accurately as possible, not your interpretations or assumptions
- Remember not to give an opinion and do not promise confidentiality

Name of child:	
Form:	
Date and time:	
Name of teacher filling in this form and their school role with signature:	Name: Role: Signature:
Update about child: N.B. Don't be afraid to ask specific questions- it's better than asking how they are feeling generally, as you may just get a polite, "I'm fine thanks" answer. e.g." I remember that you had some problems around ... a few weeks/months ago and I was wondering how you were feeling about this previous worry now?" Suggested date of next review:	

Now please thank the child for talking openly with you and, if necessary, remind them they've done nothing wrong in talking to you. If necessary, inform the child what you will do with the information and what will happen next. Do not inform parents until you have had a discussion with your safeguarding lead.

Pass this form to the school's DSL (Katherine Lowther) asap. Thank you.

Appendix 5: Use of Reasonable Force (extract from Behaviour and Discipline Policy, section 11.2)

In line with the Department for Education's policy "Use of Reasonable Force" (July 2013), we reserve the right for our staff to use *reasonable force* to control or restrain a pupil in specific circumstances.

What is 'reasonable force'?

- The term 'reasonable force' covers the broad range of actions used by most teachers at some point in their careers that involve a degree of physical contact with pupils. Force is usually used either to control or restrain. This can range from guiding a pupil to safety by the arm through to more extreme circumstances such as breaking up a fight or where a child needs to be restrained to prevent violence or injury.
- 'Reasonable in the circumstances' means using no more force than is needed. As mentioned above, schools generally use force to control pupils and to restrain them. Control means either passive physical contact, such as standing between pupils or blocking a pupil's path or active physical contact such as leading a pupil by the arm out of a classroom.
- Restraint means to hold back physically or to bring a pupil under control. It is typically used in more extreme circumstances, for example when two pupils are fighting and refuse to separate without physical intervention.
- School staff should always try to avoid acting in a way that might cause injury, but in extreme cases, it may not always be possible to avoid injuring the pupil.

When and who can use reasonable force?

- All members of school staff have a legal power to use reasonable force (under Section 93 of Education and Inspections Act 2006)
- This power applies to any member of staff at the school.
- Reasonable force can be used to prevent pupils from hurting themselves or others, from damaging property, or from causing disorder.
- In a school, force is used for two main purposes – to control pupils or to restrain them.
- The decision on whether or not to physically intervene is down to the professional judgement of the staff member concerned and should always depend on the individual circumstances.

Examples of when reasonable force may be used include:

- *"Committing any offence (or, for a pupil under the age of criminal responsibility, what would be an offence for an older pupil)"*
- *"Causing personal injury to any person (including the pupil themselves)"*
- *"Causing damage to the property of any person (including the pupil themselves)"*
- *"Prejudicing the maintenance of good order and discipline at the school, and among any pupils receiving education at the school, whether during a teaching session or otherwise"*

All of our staff are made aware of the circumstances in which reasonable minimum force may be used, as part of their induction. In particular, they are advised always to:

- use their voices first
- to use the minimum force necessary to restrain a child for the shortest possible period of time

Factors that must be considered in reaching a judgement as to whether the use of physical restraint is appropriate include:

- *"The seriousness of the incident, assessed by the effect of the injury, damage or disorder that is likely to result if force is not used"*
- *"The chances of achieving the desired result by other means"*
- *"The relative risks associated with physical intervention compared with using other strategies"*

Every member of staff must inform the Headmaster immediately after s/he has needed to restrain a pupil physically. We will always inform a parent when it has been necessary to use physical restraint, and invite them to the school, so that we can, if necessary, agree on a programme for managing that individual pupil's behaviour.

IT IS THE SCHOOL'S POLICY THAT CORPORAL PUNISHMENT MUST NOT BE USED, OR THREATENED TO BE USED, AT ANY TIME.

Appendix 6: Staff Low Level Concern Form

Pownall Hall School - Low Level Concern Template for Staff -master copy (to be completed in black ink)

Where a member of staff has concerns about another member of staff, whether they are permanent staff, supply teachers, volunteers or contractors they should report these to the Headmaster using the Low Level Staff Concern Sheet. Copies of these are available on the shared drive and staff notice boards. Where appropriate, an assessment of transferable risk to children with whom the person works should be undertaken. Where appropriate the Headmaster will seek advice from the local authority designated officer (LADO).

Our Safeguarding Policy references 'Whistle Blowing' and the procedures staff should follow in the event of a safeguarding concern about another person.

Safeguarding forms a vital part of our induction process for all staff. KCSIE (2025)

Full name of staff member who is causing concern and role

Date and time of incident

Full name of person completing this form and role

Place of incident

Name any other members of staff or children involved

Reason for concern and details:

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Date and details of discussion between staff member of concern with their line manager

Further actions/expected outcomes

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Date this form was completed

Signature of person completing form

Member of SLT concern has been shared with & date shared

Entry on chronology

Entry on chronology