



Safeguarding Policy

Reviewed September 2026

Modelled on the Hertfordshire County Council

Child Protection Policy for Schools (Issue Date: August 2026)

1. AIMS

- 1.1 To be a Catholic school where all members of the community live according to Gospel values and the principles and teachings of Mary Ward, promoting the virtues of freedom, sincerity, justice truth and joy, to allow all members of the community to feel secure and able to work and live in an atmosphere of courtesy and respect.
- 1.2 The Governors seek to ensure that the values of Mary Ward are reflected in the planning and delivery of all policies. The principle values covered by this policy are:
 - Freedom – This policy aims to ensure that children are protected from harm and are thereby given the freedom to live their lives to the full.
 - Justice – This policy also aims to ensure that those who seek to harm children in any way are prevented from doing so and, when necessary, face the legal consequences of their actions.
 - Truth – To be a community where people feel safe and are encouraged to share their worries and speak about their concerns.
- 1.3 To inform governors, staff, parents and volunteers about the school's responsibilities for safeguarding children.
- 1.4 To enable everyone to have a clear understanding of how these responsibilities should be carried out.

2. SAFEGUARDING POLICY STATEMENT

- 2.1 A whole-school, child-centred approach is fundamental to all aspects of everyday life at our school. At Loreto College, St Albans we strive to create a culture which enables children to express their wishes and feelings and talk about anything that is of importance to them. We believe that every child deserves to receive an education within an environment where they feel safe to learn and develop. We want our pupils, staff, parents and carers to have confidence and trust in our goals and know that collaborative working is fundamental to create and maintain a child-centred approach to safeguarding.
- 2.2 In practice this means we endorse the key principle that the welfare of a child is paramount, keeping them at the centre of all decision making in our partnership working with them, their families, and those supporting them.
- 2.3 In line with our duties set out in the Children Act (1989, 2004) and Working Together (2023) we are committed to providing support and help as soon as possible, underpinned by our values that children are best looked after within their families, with their parents playing a full part in their lives where possible. We are also committed to ensuring that we work with agencies, including the Local Authority, to access support and targeted interventions for families when we consider that a child is, or may be, at risk of harm.

- 2.4 We hope that parents and carers will support us to undertake our statutory duties to offer early help support and share information with other agencies where necessary. We want to work in collaboration with parents and carers to promote the health and welfare of all our pupils. We know that when children feel safe they are free to learn and develop.
- 2.5 This policy outlines the commitment to our legal duties to safeguard children, the responsibilities for all our staff and the specific roles and responsibilities for our key Designated Safeguarding Leads and Governance.
- 2.6 At Loreto College, St Albans we are committed to safeguarding and promoting the welfare of all children and young people. We recognise that safeguarding is everyone's responsibility and that children have the right to be protected from harm, abuse, neglect, exploitation, and violence.
- 2.7 We are committed to maintaining a safe, inclusive, and supportive environment where pupils feel valued, listened to, and able to share their worries and concerns. We adopt a whole-school, child-centred approach that places the needs, wishes, and best interests of children at the heart of all decision-making.
- 2.8 We work in partnership with parents, carers, Hertfordshire Children's Services, health professionals, the police, and other agencies to identify concerns early, provide appropriate support, and take timely action to keep children safe. We recognise the importance of early help and are committed to ensuring children and families receive support as soon as needs are identified.
- 2.9 Our safeguarding practice is underpinned by the principles of the Children Acts 1989 and 2004, Working Together to Safeguard Children, the Children and Social Work Act 2017, Keeping Children Safe in Education, and local Hertfordshire safeguarding procedures.
- 2.10 This policy applies to all staff, governors, trustees, volunteers, contractors, and visitors working on behalf of the school. The welfare of the child is paramount in all that we do, and we are committed to ensuring that every child has the opportunity to learn, develop, and thrive in a safe environment.

3. **IMPORTANT SAFEGUARDING CONTACTS**

School's In-House Contacts

Organisation / Role	Name	Contact details
Designated Safeguarding Lead (DSL)	Mrs C Ransom	cransom@loreto.herts.sch.uk
Deputy Designated Safeguarding Leads(DDSL)	Mrs D Brown Mrs J Caulfield Mr P Downes	dbrown@loreto.herts.sch.uk jcaulfield@loreto.herts.sch.uk pdownes@loreto.herts.sch.uk
Designated Teacher for Children Looked After (DT for CLA)	Ms M Baptisto	mbaptisto@loreto.herts.sch.uk
Special Educational Needs Coordinator (SENCO)	Mrs D Brown	dbrown@loreto.herts.sch.uk
Mental Health Lead	Mrs D Brown	dbrown@loreto.herts.sch.uk

DSL Prevent Lead	Mrs C Ransom	cransom@loreto.herts.sch.uk
Chair of Governors	Mr M Healy	mhealy@loreto.herts.sch.uk
Vice Chair of Governors		
Link Safeguarding Governor	Mr M Healy	mhealy@loreto.herts.sch.uk

Non School Contacts

Organisation / Role	Name	Contact details
Local Authority Designated Officer (LADO)	Duty LADO	Strictly for professionals use only
Hertfordshire County Council Children's Social Care	Customer Service Centre	Children's Social Care Report concerns about a child or request support Hertfordshire County Council Children's Services Out of Hours Service (SOOHS) 0300 123 4043
Families First	Families First website, information for parents, carers and professionals Professionals can access support from Families First Coordinators when supporting a family with an FFA or other support in the EH arena	Families First (hertfordshire.gov.uk)
Prevent	Prevent referrals Parent guidance Advice line for members of the public Channel helpline	Prevent Referrals – prevent@herts.police.uk Prevent National Referral Form 2024 Parents' Booklet (educateagainsthate.com) ACT Early Prevent radicalisation 0800 011 3764 020 7340 7264
NSPCC Helpline	N/A	Call: 0808 800 5000 Email help@NSPCC.org.uk .

Police	N/A	Emergency 999, Non-emergency 101
--------	-----	-------------------------------------

4. **LEGISLATION, STATUTORY GUIDANCE AND LOCAL PROCEDURES**

4.1 Loreto College's child protection policy is based on the following Legislation, Statutory Guidance and Hertfordshire Safeguarding Children Partnership's – local guidance and procedures:

4.1.1 **Legislation:**

Reference	Purpose / Summary
Education Act 2002 (s175)	Duty on schools and local authorities to safeguard and promote welfare.
Children Act 1989	Framework for child protection and welfare.
Children Act 2004	Strengthens inter-agency safeguarding duties.
Children's Wellbeing and Schools Act 2026.	Aims to improve outcomes for children through stronger safeguarding, better social care support, and improvements to the education system.
Sexual Offences Act 2003	Legal framework for offences against children.
Safeguarding Vulnerable Groups Act 2006	Defines regulated activity and barring arrangements.
Protection of Freedoms Act 2012	Reformed DBS and vetting system.
Serious Crime Act 2015 (FGM)	Mandatory reporting duty for known FGM cases.
Children and Social Work Act 2017	Strengthened safeguarding partnerships.
Data Protection Act 2018 & UK GDPR	Lawful handling and sharing of information.
Domestic Abuse Act 2021	Recognises children as victims of domestic abuse.
Education and Training (Welfare of Children) Act 2021	Safeguarding duties for post-16 providers.
Online Safety Act 2023	Protection from online harms.

4.1.2 Statutory Guidance:

Reference	Purpose / Summary
Keeping Children Safe in Education 2026	Core safeguarding guidance for schools and colleges.
Working Together to Safeguard Children	National multi-agency safeguarding framework.
Prevent Duty Guidance	Preventing radicalisation and terrorism.
Information Sharing Advice	Guidance on information sharing.
Children Missing Education	Guidance on CME responsibilities.
Working Together to Improve School Attendance	Attendance as a safeguarding issue.
EYFS Statutory Framework	Safeguarding and welfare requirements for early years providers.
Childcare Act 2006	Regulation of childcare provision.

4.1.3 Reference:

Reference	Purpose / summary
Hertfordshire Safeguarding Children Partnership (HSCP)	Local safeguarding arrangements.
HSCP Procedures Manual	Multi-agency child protection procedures.
Resolution of Professional Differences and Escalations	Procedure for resolving safeguarding disagreements.
Families First / Early Help	Early intervention and support.

5. **DEFINITIONS: SAFEGUARDING AND CHILD PROTECTION**

- 5.1 All staff at Loreto College, St Albans are responsible for safeguarding and promoting the welfare of children. By reading and understanding the school's safeguarding policies, procedures and the principles of Keeping Children Safe in Education (KCSIE), staff are equipped to identify concerns, take appropriate action, and help ensure that all children are safe, supported and able to thrive.

5.2 **Safeguarding** as defined in Keeping Children Safe in Education (2026), means:

- *providing help and support to meet the needs of children as soon as problems emerge*
- *protecting children from maltreatment, whether that is within or outside the home, including online*
- *preventing 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.*

5.3 **Working Together to Safeguard Children (2023)** further extends this definition to include:

- *promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children*
- *taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.*

5.4 **Children:** The legal definition of a child in the UK includes everyone under the age of 18.

5.5 **'Early Help'** is a term used in Hertfordshire that refers to a wide range of interventions offered by various organisations and partner agencies, as well as services within the County Council and beyond. The primary early help service in Hertfordshire is known as "[Families First](#)" which is in place to help professionals and families find early help and information as soon as problems emerge to prevent issues from getting worse. Support and interventions under the Families First umbrella can help coordinate additional support to that which is available from a family's usual support network as well as more targeted and short pieces of interventions.

5.6 **'Families First'** is Hertfordshire's Early Help service. It is a multi-agency approach that supports children, young people and families when difficulties are emerging, before concerns escalate to the threshold for statutory social care intervention. The service aims to:

- Identify needs early.
- Coordinate support around the child and family.
- Improve outcomes for children and young people.
- Build family resilience and independence.
- Prevent problems from escalating into crises requiring social care involvement.

It offers professionals and families access to information, advice and support at the earliest opportunity, reducing the likelihood of concerns escalating and improving outcomes for children.

Families First Assessments (FFAs) are 'offered' to families, and parents and/or carers must consent before an assessment is undertaken. We offer these when we consider a child, young person or family would benefit from additional support to address emerging needs and improve outcomes. The assessment helps to identify a family's strengths, needs and circumstances, ensuring that the right support can be provided at the earliest opportunity.

5.7 **'Family Help'** is the emerging national model for providing coordinated support to children and families when additional needs are identified. It forms a key part of the Government's children's social care reform programme and is being developed through the Families First Partnership Programme, at Loreto College, St Albans we are aware that this will shape our current way of working for example we will be included in 'a more joined-up' way of working with partners and families, focus on 'family-centred system' of inclusive support. We know that Family Help will be building on the principles of current practice of Early Help offer, for

example strengthening multi-agency working and bringing together universal services, targeted support and specialist interventions to ensure our children and families receive the right help at the right time.

At the time of publication of this policy, Hertfordshire has not yet transitioned to the national Family Help model and therefore we will continue to operate with our Families First arrangements, this means all staff should continue to follow current Hertfordshire referral processes, thresholds and procedures. This policy will be reviewed and updated as local arrangements develop in line with national Family Help reforms.

The Continuum of Need framework helps us work collaboratively with families, promoting early intervention wherever possible, whilst ensuring that children who are suffering, or are at risk of suffering, significant harm receive a prompt and appropriate safeguarding response. The framework informs, but does not replace, professional curiosity, professional judgement, or decision-making based on the individual needs and best interests of the child.

- 5.8 **Child in Need:** Under the Children Act 1989, local authorities are under a general duty to provide services for children in need for the purposes of safeguarding and promoting their welfare. A Child in Need is defined under Section 17 of the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired without the provision of services, or a child who is disabled.

- 5.9 **Child Protection** is part of safeguarding and relates to action taken to protect children who are suffering, or are likely to suffer, significant harm. Under Section 47 of the Children Act 1989, local authorities must make enquiries where there is reasonable cause to suspect significant harm.

Child protection concerns may arise from abuse, neglect, exploitation, domestic abuse, online harms, or other safeguarding risks. In some cases, urgent action may be needed to ensure a child's immediate safety.

At Loreto College, St Albans we work closely with Children's Social Care, Health, Police and other agencies to share information, contribute to assessments and support effective safeguarding arrangements.

Significant harm is the legal threshold for statutory intervention and is assessed based on the child's individual circumstances, needs and the impact on their health, development and wellbeing. We place children at the centre of all safeguarding decisions and are committed to ensuring a timely, coordinated response to protect and support them.

- 5.10 **The Gateway** is Hertfordshire's single point of contact for safeguarding, early help and social care concerns. Contacts can be made by professionals, family members or the public when there are concerns about a child's welfare, safety or wellbeing.

Following a contact, Children's Services will determine the most appropriate response, which may include a referral to Children's Social Care, Early Help support, or signposting to other services.

At all times, decisions should be child-centred and strengths-based, with children and families involved wherever it is safe and appropriate to do so. The child's welfare, voice and best interests remain central to all assessment, planning and intervention.

- 5.11 **The Multi-Agency Safeguarding Hub (MASH)** is part of Hertfordshire's Gateway Service and brings together Children's Services, Health, Police and other partners to share information, assess risk and make timely safeguarding decisions.

Through multi-agency working, MASH helps ensure children and families receive the right support at the right time, whether through Early Help, targeted services or statutory Children's Social Care intervention. The child's safety, welfare and best interests remain central to all decision-making.

- 5.12 **Abuse** is the maltreatment of a child through causing harm or failing to prevent it. Children may be abused by adults or other children in the home, community, education settings or online.
- 5.13 **Neglect** is the persistent failure to meet a child's basic physical and/or emotional needs, resulting in harm to their health, wellbeing or development. It is one of the most common forms of child abuse.
- 5.14 **Exploitation** occurs when a child is manipulated, coerced or controlled for another person's benefit. It may be sexual, criminal, financial or online and can include child criminal exploitation (CCE), child sexual exploitation (CSE), county lines, trafficking and modern slavery.
- 5.15 **Extra-familial harm** refers to abuse and safeguarding risks that occur outside the family home, including child-on-child abuse, exploitation, serious violence, relationship abuse and online harm.
- These forms of harm often overlap. Practitioners should consider the child's lived experience and assess concerns holistically to ensure children receive the right support at the right time.
- 5.16 **Children Looked After:** A child is 'looked after' (in care) if they are in the care of the Local Authority for more than 24 hours. Children can be in care by agreement with parents or by order of a court. The placement providing the care can be a connected person to the child or a Local Authority approved foster carer.
- 5.17 **Kinship Care** refers to a type of care where a child who cannot be looked after by their birth parents is cared for by relatives or friends. The government in England has launched a Championing kinship care: the national kinship care strategy to improve kinship carers' financial stability, education, training, and partnership with local authorities and other agencies.

Legal Care Arrangements:

- Informal Kinship Care
- Special Guardianship Order (SGO)
- Child Arrangements Order (CAO)
- Kinship Foster Care
- Private Fostering
- Adoption by a Family Member or Friend

- 5.18 **Victim** is a term commonly used in safeguarding practice. However, at Loreto College, we recognise that not all children identify with this term. We will use language that reflects the child's views, wishes and feelings, ensuring they feel heard, respected, supported and protected.
- 5.19 **Harmful behaviours** – for children displaying harmful behaviours, the terms alleged perpetrator and perpetrator may be used in safeguarding and legal processes. However, at Loreto College, St Albans, we recognise that children who harm others may also have experienced abuse, trauma or other vulnerabilities. We take a child-centred approach, ensuring that both the child who has experienced harm and the child displaying harmful behaviour receive appropriate

6. EQUALITY STATEMENT, CHILDREN WITH PROTECTED CHARACTERISTICS

6.1 Equality, Diversity and Inclusion

6.1.1 At Loreto College we recognise that some children may be at greater risk of harm, both online and offline, and that additional barriers may exist which can affect a child's ability to recognise, disclose or seek support when experiencing abuse, neglect, exploitation or other safeguarding harms. We understand that these barriers may be linked to a child's age, disability, communication needs, health needs, family circumstances, culture, ethnicity, faith, sexual orientation, gender, or other protected characteristics. We also recognise that safeguarding harms can be compounded by discrimination, prejudice, isolation, stigma or unequal access to support.

6.1.2 We are committed to providing a child-centred, inclusive and anti-discriminatory safeguarding response that promotes equality, diversity and inclusion. All children have the right to be protected from harm and to receive support that recognises their individual needs, lived experiences, strengths and vulnerabilities. Staff will remain professionally curious and take positive action to ensure that no child is disadvantaged or overlooked because of a protected characteristic, additional need or barrier to communication.

6.1.3 Equality Act 2010, we recognise the following protected characteristics:

Age, Disability, Gender reassignment, Marriage and Civil Partnership, Pregnancy and maternity, Race, Religion or belief, Sex and Sexual orientation

6.1.4 We also recognise that certain groups of children may require additional consideration and support, including children with SEND, young carers, children with medical conditions, children who are absent from education, children in care or previously looked after, children experiencing mental health difficulties, and children who may be vulnerable to abuse, neglect, exploitation or extra-familial harm. Safeguarding decisions will always be made in the best interests of the child and with their welfare as our paramount consideration.

6.1.5 Children with SEND may face additional barriers to recognising, reporting or disclosing abuse, neglect or exploitation. At Loreto College, we are committed to ensuring these children are seen, heard and supported.

6.1.6 Staff will work closely with the SENCO, families and partner agencies to understand individual needs, make reasonable adjustments where required, and ensure safeguarding concerns are identified and responded to appropriately. We recognise that children with SEND may be more vulnerable to abuse, bullying, discrimination and communication barriers, and we will ensure their welfare, views and lived experiences remain central to all safeguarding decisions.

6.1.7 We recognise the importance of early intervention and multi-agency working and will make use of and signpost children, parents and carers to Hertfordshire SEND Local Offer, alongside other local services and support networks, to help children and families access appropriate provision, advice and specialist support. Safeguarding decisions will always be made in the best interests of the child, with their welfare, safety and wellbeing at the centre of our practice.

6.2 Children Looked After (CLA)

6.2.1 The most common reason for a child to become looked after is as a result of abuse and/or neglect. We therefore ensure that the appropriate arrangements are in place to support these children and keep them safe from further harm. This includes:

- appointment of a Designated Teacher (DT) for CLA
- appropriate staff made aware of a child's looked after status

- ensure that necessary staff have the skills, knowledge and understanding of the child's needs
- ensure the child's record contains a clear understanding of their legal status and care arrangements, including the levels of authority delegated to their carer and contact arrangements with birth parents or those with parental responsibility
- keep contact details of the child's social worker, carer(s) and name and contact details of the virtual school head for DT to liaise with.

6.3 **The Hertfordshire Virtual School** works with schools and partner agencies to remove barriers to education, improve attendance and wellbeing, and promote positive outcomes for children in care, previously in care, those with a social worker, and children in kinship care arrangements.

6.3.1 At Loreto College St Albans we will work collaboratively with the Virtual School, social workers, families and other professionals to ensure children receive the support they need to be safe, achieve well and reach their full potential. We recognise that children who have, or have previously had, a social worker may require additional support and will work with relevant agencies to identify and address barriers to learning, attendance, wellbeing and safeguarding.

6.3.2 This is also in line with Promoting the education of children with a social worker and children in kinship care arrangements: virtual school head role extension - GOV.UK

6.4 **Children who have previously had or have a social worker**

6.4.1 We recognise that children with a social worker may require additional support to achieve positive educational and safeguarding outcomes. We will work closely with social workers, the Virtual School, families and partner agencies to identify and address barriers to learning, attendance, wellbeing and safeguarding. The Virtual School Head provides advice and guidance to schools and other professionals to help improve outcomes for children with a social worker and ensure they receive the support they need.

6.5 **Children in kinship care arrangements**

6.5.1 This means any friend or family member, who is not a child's parent but raising them for a significant amount of the time, either as a temporary or permanent arrangement. We recognise that children living in kinship care arrangements may have additional educational, emotional or safeguarding needs. We will work collaboratively with kinship carers, families and relevant professionals to ensure that children receive the support they need to be safe, included and successful. Where appropriate, we will seek advice and guidance from the Virtual School to help promote positive educational and wellbeing outcomes.

6.6 **Children who are in Elective Home Education (EHE)**

6.6.1 We recognise that parents have the right to educate their children at home. However, we are also aware that some children receiving Elective Home Education may be more vulnerable to safeguarding risks due to reduced visibility to professionals. Where concerns exist, we will work with the Local Authority and other agencies as appropriate to ensure that children are safe, their welfare is promoted, and they receive a suitable education.

6.7 **Children Missing from Education (CME)**

6.7.1 We recognise that children missing from education are at increased risk of harm and may be vulnerable to abuse, neglect, exploitation and other safeguarding concerns. We will follow Hertfordshire and local authority procedures to identify, track and support children who are missing education and will work with families and partner agencies to ensure children remain

safe and receive a suitable education. Children missing education will always be considered a potential safeguarding concern.

- 6.8 **Designated Teacher (DT)** Loreto College, St Albans, ensures that our DT has the appropriate training, so they can take the leadership of this crucial area of our safeguarding arrangements in collaboration with our Designated Safeguarding Lead, which includes:
- working closely with virtual school heads to ensure that funding is best used to support the child's educational achievement and development needs that are identified in their personal education plans, and
 - collaborating with the virtual school heads to also promote the educational achievement of previously looked after children.

7. **ROLES AND RESPONSIBILITIES OF STAFF INCLUDING LEADERSHIP AND MANAGEMENT**

7.1 **Staff Roles and Responsibilities and Safeguarding and Child Protection Training**

- 7.1.1 Safeguarding is everyone's responsibility. All staff, including leaders, teachers, support staff, volunteers, contractors, temporary and supply staff, share responsibility for safeguarding and promoting the welfare of children.
- 7.1.2 We will ensure all staff, governors and volunteers are appropriately trained, risk assessed and vetted in line with current safeguarding and safer recruitment requirements. All staff must read and understand Keeping Children Safe in Education (KCSIE) 2026 and follow the school's safeguarding and child protection procedures.
- 7.1.3 Staff are expected to:
- Maintain a child-centred approach and act in the best interests of children.
 - Recognise and respond to signs of abuse, neglect, exploitation and other safeguarding concerns.
 - Listen to, support and take children seriously when concerns are raised or disclosures are made.
 - Record and report concern promptly in line with school procedures.
 - Work effectively with the DSL, partner agencies and other professionals.
 - Understand that safeguarding concerns can occur online and offline and may overlap.
 - Identify children who may benefit from Early Help or additional support.
 - Undertake regular safeguarding training and maintain professional curiosity.
 - Understand that information sharing is essential where a child may be at risk of harm.
- 7.1.4 All staff should recognise that children may not always be ready or able to disclose abuse and that timely action is essential to keeping children safe. Further information is provided in Appendix 2.
- 7.1.5 The Crime and Policing Act 2026 removed the supervision exemption, meaning some volunteers may now be considered to be undertaking regulated activity. We will ensure that volunteers and all other adults working within the school are appropriately risk assessed and vetted in line with current safer recruitment and regulated activity requirements. Further information is provided in the Safer Recruitment section.
- ### 7.2. **Roles and Responsibilities of the Designated Safeguarding Lead (DSL)**
- 7.2.1 The governing body/proprietor has appointed a Designated Safeguarding Lead (DSL), a senior member of the leadership team with overall responsibility for safeguarding and child protection, including online safety and filtering and monitoring. The DSL is supported by

suitably trained Deputy DSLs and provided with the time, training and resources needed to carry out the role effectively. The responsibilities of the DSL are set out in Annex B of Keeping Children Safe in Education (KCSIE) 2026.

NB in Hertfordshire deputy DSLs are trained to the same standards as the DSL.

7.2.2 Deputy Designated Safeguarding Leads (DDSLs) support the DSL and carry out safeguarding responsibilities as required.

7.2.3 The school has appointed one or more Deputy Designated Safeguarding Leads (DDSLs) who are trained to the same standard as the Designated Safeguarding Lead (DSL).

- While the DSL has overall responsibility for safeguarding and child protection, DDSLs support the DSL and may undertake safeguarding duties as required.
- Arrangements are in place to ensure that a trained DSL or DDSL is available during school hours to respond to concerns promptly and ensure effective safeguarding practice.
- Arrangements are in place for cover over the school holidays for statutory request and queries.

7.2.4 Availability

- The Designated Safeguarding Lead (DSL), or a trained Deputy DSL (DDSL), will be available during term time and school hours to respond to safeguarding concerns and provide advice and support to staff.
- The school maintains clear safeguarding systems, reporting procedures, record-keeping and information-sharing arrangements to ensure concerns are identified, reported and acted upon promptly. Appropriate arrangements are in place to ensure safeguarding cover is available during school closure periods to fulfil statutory safeguarding responsibilities and respond to urgent child protection matters.

7.2.5 Safeguarding Systems and Contingency Planning

- The school recognises that effective safeguarding is underpinned by a whole-school safeguarding culture, supported by robust systems and processes. Safeguarding arrangements must not be reliant on the availability, actions or knowledge of a single individual. In Hertfordshire our deputy DSL / S are trained to the same standard as the DSL.
- To ensure concerns are identified, reported and acted upon promptly, the school maintains:
- Clear reporting pathways.
- Secure safeguarding record-keeping systems.
- Effective information-sharing arrangements.
- Appropriately trained Deputy Designated Safeguarding Leads (DDSLs).
- This systems-based approach supports continuity, accountability and timely decision-making, including during periods of staff absence, leave or organisational change.

7.2.6 School Holiday and Closure Periods, although availability may be reduced during school holidays and half-term periods, arrangements are in place to ensure DSL cover is maintained to fulfil statutory safeguarding responsibilities. This includes responding to urgent safeguarding concerns, sharing information with Children's Services and the Police, making referrals where necessary, and contributing to Child Protection Conferences, MARAC meetings and other statutory processes.

7.2.7 Managing Referrals

- The Designated Safeguarding Lead (DSL) and Deputy DSLs are responsible for managing safeguarding and child protection referrals, including referrals to Children's Social Care, the Police, the Channel Programme, the Local Authority Designated Officer (LADO) and other relevant agencies.
- They will ensure safeguarding concerns are assessed and acted upon promptly, monitor referral outcomes, work effectively with partner agencies, and ensure the school fulfils its role in multi-agency safeguarding arrangements. The child's welfare will remain central to all decision-making.

7.2.8 Working with Others

- The DSL will act as the school's key point of contact for external safeguarding agencies and professionals. They will work collaboratively with safeguarding partners, social workers, health professionals, police and other agencies to safeguard and promote the welfare of children.
- The DSL will attend and contribute to child protection conferences, core group meetings, strategy discussions and other multi-agency meetings as required, ensuring that the school's views and relevant information are shared appropriately and in the best interests of the child.

7.2.9 Information Sharing and Child Protection Records

- The DSL is responsible for ensuring that safeguarding and child protection records are accurate, confidential, secure and maintained separately from the main pupil file.
- The DSL will oversee the transfer of child protection records when pupils move schools or settings and ensure information is shared appropriately, lawfully and in accordance with data protection requirements and safeguarding legislation. Effective information sharing is recognised as essential to protecting children from harm.

7.2.10 Raising Awareness

- The DSL will promote a strong safeguarding culture throughout the school by ensuring that safeguarding policies and procedures are understood, implemented and reviewed regularly.
- The DSL will ensure that staff, volunteers, pupils, parents and carers are aware of safeguarding arrangements and know how concerns can be reported. They will contribute to safeguarding communications and ensure that safeguarding remains a visible priority across the school community.

7.2.11 Training, Knowledge and Skills

- The DSL will undertake appropriate safeguarding training and update their knowledge and skills regularly in line with statutory requirements. They will maintain an up-to-date understanding of safeguarding issues, local procedures, emerging risks and national guidance.
- The DSL will support the safeguarding training and development of staff by providing advice, guidance and safeguarding updates, ensuring that all staff understand their safeguarding responsibilities and can recognise and respond to concerns effectively.

7.2.12 Providing Support to Staff

- The DSL will provide support, advice and guidance to staff on safeguarding and child protection matters. They will help staff understand indicators of abuse, vulnerability and risk and support them in responding appropriately to concerns.

- The DSL will create an environment where staff feel confident to raise concerns and seek safeguarding advice. They will promote professional curiosity, timely reporting and a culture where safeguarding is everyone's responsibility.

7.2.13 Understanding the Views, Wishes and Feelings of Children

- The DSL will ensure that the voice of the child is understood, considered and reflected in safeguarding practice. They will promote a child-centred approach in which children are listened to, taken seriously and supported to express their views.
- The DSL will consider the wishes and feelings of children when determining what action to take and will ensure that safeguarding decisions are made in the child's best interests

7.2.14 Monitoring Vulnerable Children

- The DSL will maintain oversight of children who may require additional support, including those with safeguarding vulnerabilities, children in need, children subject to child protection plans, children looked after and previously looked after children.
- They will monitor patterns, trends and emerging concerns, ensuring that appropriate support, intervention and early help are coordinated where required.

7.2.15 Holding and Sharing Information

- The DSL will ensure that information is held and shared appropriately with relevant professionals, agencies and staff members on a need-to-know basis. They will ensure that records are accessible to those who need the information to safeguard children whilst maintaining appropriate confidentiality.
- The DSL will ensure that safeguarding information is integrated into the school's wider safeguarding arrangements and is used to inform effective decision-making and support for children.
- The full responsibilities of the DSL and deputy(s) are set out in their job description, see Annex B KCSIE

7.3 Roles and Responsibilities of the Designated Teacher (DT)

7.3.1 Our Designated Teacher takes leadership of promoting the educational attainment of Children with a Social Worker which includes:

- Working closely with Virtual School Heads to ensure that funding is best used to support the child's educational achievement and development needs that are identified in their personal education plans.
- Carrying out their duties in line with Designated teacher for looked-after and previously looked-after children - GOV.UK (www.gov.uk) - Search and extended duties as outlined Promoting the education of children with a social worker and children in kinship care arrangements: virtual school head role extension - GOV.UK (www.gov.uk).
- Working closely with our DSL for those children who are supported by a Child in Need or Child Protection Plan to ensure support for the education attainment of these children is appropriately entwined with safeguarding processes.

7.3.2 All staff and leadership are required to support HSCP principals to safeguarding children by always exercising their professional curiosity. April 2025 Professional Curiosity

7.4 Role and Responsibilities of the Governance

7.4.1 Our Governing Body have a strategic role within our leadership and management team and must ensure that all staff comply with legislation and local guidance at all times.

7.4.2 The Governing Body will:

- facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development for the setting
- evaluate and approve this child protection policy along with other policies related to safeguarding at each review, ensuring they comply with the law, and hold the Headteacher to account for their implementation
- evaluate and approve recommendations/action plans identified through quality assurance activity that the Headteacher/DSL undertakes to review safeguarding practice through audits and annual/termly governing reports to ensure that they have regular oversight and hold the Headteacher/Principal accountable for the practice improvement
- be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- appoint a link governor to monitor the effectiveness of the school's safeguarding arrangements including policies and their implementation, in conjunction with the full governing body. This is always a different person from the DSL
- ensure all staff undergo safeguarding and child protection training, including online safety according to their roles, and that such training is regularly updated and is in line with statutory guidance and Hertfordshire Safeguarding Children's Partnership
- ensure that all governors/trustees:
 - read [Keeping Children Safe in Education in its entirety](#), and review compliance of this task at least annually
 - sign a declaration at the beginning of each academic year to say that they have reviewed the above guidance
- ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
 - making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
 - reviewing the DfE's filtering and monitoring standards and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards.

7.4.3 The Governing Body will make sure:

- the DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- the DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place

- the school has effective procedures to manage any safeguarding concerns (no matter how small) that arise. This includes those related to child welfare concerns, low level concerns and allegations made against staff
- that this policy reflects those children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- where another body is providing services or activities on the school site (regardless of whether or not the children who attend these services/activities are children on the school roll):
 - seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place and inspect them if needed
 - make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate.
- make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.
- the Chair of Governors will act as the 'case manager' in the event that an allegation is made against the Headteacher. where appropriate (see Section 11 Managing Concerns and Allegations)
- Section 14 (Training) of this policy has information on how governors are supported to fulfil their role, also see Part two KCSiE 2026.

7.5 **Role and Responsibilities of the Headteacher/Principal**

7.5.1 The Headteacher will:

- implement this policy and ensure that all staff:
 - are informed of our school's systems which support safeguarding, including reading and understanding this policy, as part of their induction
 - follow the procedures included in this policy, what they should know and do in relation to information sharing and referrals of cases of suspected abuse and neglect
- make this policy available to parents/carers, professionals and the community to ensure there is transparency and clear expectations about the school's duty to safeguarding and promote the welfare of children and the arrangements for responding to children presenting with needs that may require early help or support to protect them. This policy is available on the school's website.
- ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- act as the 'case manager' representing the school in the event of an allegation of abuse made against another member of staff or volunteer
- managing cases where there are low-level concerns regarding the conduct of staff, or oversee delegation to the DSL

7.6 **Safeguarding and Child Protection Training and professional development**

- 7.6.1 At Loreto College, St Albans we are committed to ensuring that all staff, governors, leaders and managers receive appropriate safeguarding and child protection training to enable them to fulfil their responsibilities to safeguard and promote the welfare of children effectively. In accordance with Keeping Children Safe in Education (KCSIE), all staff receive safeguarding and child protection training as part of their induction, and this is regularly updated to ensure that knowledge and skills remain current and effective. Staff also receive safeguarding updates, as required, and at least annually, through a range of resources and means, such as training sessions, briefings, staff meetings, newsletters and safeguarding communications.
- 7.6.2 Training is relevant to everyone's role and responsibilities within the school. The specific safeguarding training requirements and standards for different staff groups are detailed in Annex 2 of this policy. Designated Safeguarding Leads (DSLs) and Deputy DSLs receive training that enables them to carry out their roles effectively and keep their knowledge and skills updated in line with statutory requirements.
- 7.6.3 The school maintains a comprehensive record of safeguarding training and monitors compliance to ensure that all staff complete the required training within the prescribed timescales. Any identified gaps are addressed promptly to ensure the school remains compliant with statutory safeguarding obligations and that all staff are equipped to recognise concerns, respond appropriately and contribute to a culture of safeguarding across the school.

8. FAMILIES FIRST AND WORKING WITH PARENTS/CARERS/FAMILIES AND AGENCIES

- 8.1 Families First / Early Help intervention.
- 8.1.1 The Families First Assessment provides a coordinated framework for professionals, children and families to work together to understand what is working well, what additional support may be required, and what outcomes they want to achieve. It enables agencies and services to share information appropriately, develop a shared understanding of need, and deliver joined-up support through a single plan.
- 8.1.2 For families with children and young people aged up to 18 years (or up to 25 years where a young person has additional needs or disabilities), Families First can provide support across a range of areas, including parenting and family relationships, emotional wellbeing and mental health, physical health, domestic abuse, substance misuse, school attendance and engagement, housing difficulties, financial pressures, and concerns that may place children and families at risk of disadvantage or harm.
- 8.1.3 The aim of the Families First process is to ensure that children and families receive the right help, at the right time, preventing difficulties from escalating and promoting positive outcomes, resilience, wellbeing and family stability.
- 8.1.4 At Loreto College, St Albans safeguarding and promoting the welfare of children is everyone's responsibility. Our DSL team maintains a clear understanding of Hertfordshire's local safeguarding procedures, thresholds and pathways for support. We recognise that every child has unique needs and circumstances and are committed to ensuring that children and families receive the right help, at the right time, so that children are protected from harm and supported to achieve the best possible outcomes.
- 8.1.5 The DSL team understands the differences between:
- Universal services and community-based Early Help;
 - Hertfordshire's Families First arrangements and emerging Family Help approaches;
 - Section 17 Child in Need services;
 - Section 47 Child Protection enquiries;

- Section 20 accommodation;
- Section 31 Care and Supervision Orders.

- 8.1.6 When assessing concerns and identifying support for children and families, we use the Hertfordshire Safeguarding Children Partnership (HSCP) Continuum of Need Guidance.
- 8.1.7 We take a child-centered, strengths-based approach, working with children, families and partners to identify needs, build on strengths and provide timely support. We regularly review concerns and share information to ensure children remain safe and supported.
- 8.1.8 The concept of 'Family Help' has evolved from the established Early Help approach. Early Help remains a fundamental safeguarding principle, focused on identifying emerging needs and providing support to children and families at the earliest opportunity to prevent concerns from escalating.
- 8.1.9 Following the Independent Review of Children's Social Care (2022), the Government's Stable Homes, Built on Love implementation strategy (2023), and the introduction of the Families First for Children Pathfinder Programme, reforms have been developed to create a more integrated system of support for children and families.
- 8.1.10 Family Help brings together targeted Early Help and Child in Need services within a single, multi-disciplinary approach. The aim is to provide families with timely, coordinated and relationship-based support through one lead practitioner and a seamless system of help, support and protection.
- 8.1.11 The reforms are being implemented through the Families First Partnership Programme (FFPP), which supports local safeguarding partners to develop Family Help services, strengthen multi-agency child protection arrangements and make greater use of family networks and family-led decision-making.
- 8.1.12 In line with Working Together to Safeguard Children and Hertfordshire Children Safeguarding Partnership, local safeguarding arrangements, the school will continue to identify children and families who may benefit from Early Help/Family Help services and will work collaboratively with partner agencies to ensure children receive the right support at the right time.

8.2 Key Legislation and Guidance, Family Help reforms are informed by:

- Children Act 1989
- Children Act 2004
- Working Together to Safeguard Children
- Keeping Children Safe in Education (KCSIE) 2026
- The Independent Review of Children's Social Care (2022)
- Stable Homes, Built on Love: Children's Social Care Implementation Strategy (2023)
- Families First Partnership Programme (2025 onwards)

8.3 The key principles that will inform the delivery of services will include:

- wrapping support around the whole-family at the earliest opportunity
- using the expertise of multi-disciplinary practitioners;
- ensuring consistency of relationships between children, families, and their lead practitioner;
- adopting one plan that will stay with families but adapt as needs change.

At Loreto College we endorse these principles and will continue to work in partnership and collaboration with children and their families so that they are supported from an early stage

by being a part of and leading the conversations about change and aims for their children. We are keen to support families in a strength and solution-based approach, encouraging motivation and confidence to improve their own agency to make safe and positive decisions for themselves and their children.

8.4 Working with Parents, Carers and Families

- 8.4.1 At Loreto College, St Albans we recognise the important role parents, carers and family networks play in safeguarding and promoting the welfare of children. In line with Working Together to Safeguard Children and the Families First Partnership reforms, we are committed to working collaboratively with families to identify needs early, provide support and improve outcomes for children.

We will:

- Work with families in a respectful, empathetic and strengths-based way.
- Recognise the impact of adversity and trauma and respond with sensitivity and compassion.
- Adapt our approach to meet the diverse needs and circumstances of children, parents and carers.
- Consider factors such as family background, culture, religion, disability and other barriers to accessing support.
- Remain alert to situations where a child may be at risk of abuse, neglect or exploitation.

We will also:

- Engage openly and honestly with parents and carers about concerns.
- Support access to Early Help, Family Help and other services at the earliest opportunity.
- Contribute to multi-agency plans and interventions.
- Recognise the value of family networks in promoting children's safety and wellbeing.
- Ensure the views, wishes and lived experiences of children and their families inform decision-making.

9. INFORMATION SHARING, CONFIDENTIALITY AND CONSENT

- 9.1 At Loreto College, St Albans we recognise that effective safeguarding is built on positive relationships with children, parents and carers, supported by openness, transparency, trust and professional curiosity. We are committed to working with families wherever possible to understand concerns and provide support at the earliest opportunity.
- 9.2 We recognise that timely, relevant, and proportionate information sharing is essential to safeguarding and promoting the welfare of children. All staff should understand that the Data Protection Act 2018 and UK GDPR does not prevent the sharing of information where this is necessary to protect a child or promote their welfare. Concerns about confidentiality must never prevent appropriate action being taken to safeguard a child.
- 9.3 The Designated Safeguarding Lead (DSL) and Deputy DSLs are responsible for ensuring that information is shared lawfully, securely, proportionately and on a need-to-know basis with relevant professionals and agencies where this is necessary to safeguard or promote the welfare of a child.
- 9.4 **Sharing information when working with Children and their Families**
- 9.4.1 At Loreto College, St Albans we endeavour to be open and honest with children and their families about concerns, support available, and the actions being taken, wherever it is safe

and appropriate to do so. We recognise the importance of involving children and families in decisions that affect them and will seek their views as a priority whenever possible.

9.4.2 As part of our commitment to work collaboratively with families, we will endeavour to seek consent when information needs to be shared or requests for support are made to support or statutory agencies. However, in some circumstances we may be so concerned for a child that we may not be required to seek consent if there is a lawful basis such as doing so may:

- Place a child or another person at increased risk of harm;
- Cause unnecessary delay in protecting a child;
- Prejudice the prevention, detection or investigation of a crime; or
- Compromise the actions of Children's Social Care, the Police or other safeguarding agencies.

9.4.3 Where information is shared without consent, the reasons for doing so will be clearly recorded. Parents and carers will normally be informed of information sharing decisions, unless doing so would place a child or another person at risk of harm, compromise a criminal investigation, or otherwise be unsafe or inappropriate.

9.4.4 Where a child, parent or carer objects to information being shared, the DSL will carefully consider their views alongside the school's legal and safeguarding responsibilities. Any decision to share information despite objections will be evidence-based, proportionate, recorded, and made in the child's best interests.

9.5 **Our principles of information sharing:**

- Timely information sharing is essential for effective safeguarding.
- The Data Protection Act 2018 and UK GDPR do not prevent or limit the sharing of information for safeguarding purposes.
- Information should be shared only with those who need to know and only when it is necessary and proportionate to do so.
- Staff must never promise a child absolute confidentiality where there are concerns about their safety or welfare.
- Concerns about a child must be reported to the DSL without delay.
- Decisions to share information, and the reasons for those decisions, must be appropriately recorded.

If staff are uncertain whether information should be shared, they must seek advice from the DSL, Deputy DSL, Headteacher or another member of the Senior Leadership Team immediately.

9.6 **Special Category Personal Data**

9.6.1 Where staff need to share special category personal data for safeguarding purposes, this may be done without consent where there is a lawful basis to do so and where:

- It is not possible to obtain consent;
- It is not reasonable to expect consent to be obtained; or
- Seeking consent would place a child or another person at risk of harm.

9.7 **Sexual Violence and Sexual Harassment**

- 9.7.1 Where a child discloses sexual violence or sexual harassment, the wishes of the victim will be considered carefully. However, the DSL must balance these wishes against the school's duty to safeguard the victim and other children.
- 9.7.2 The DSL will consider:
- The victim's wishes and right to be heard;
 - The nature and seriousness of the incident;
 - The ongoing safety and welfare of all children involved;
 - Whether a referral to Children's Social Care and/or the Police is required;
 - Whether parents or carers should be informed, unless doing so would place the child at greater risk.
- 9.7.3 Where a report of rape, assault by penetration or sexual assault is made, the matter should normally be referred to the Police. Where appropriate, referrals should also be made to Children's Social Care.
- 9.7.4 All staff will take reasonable steps to protect the privacy and anonymity of children involved in reports of sexual violence or sexual harassment. This includes carefully considering who needs to know, managing information sensitively, and recognising the potential impact of social media in spreading information or identifying those involved.

9.8 **Record Keeping and Professional Support**

- 9.8.1 All safeguarding records relating to information sharing decisions will be accurate, factual, timely, and securely maintained. Staff should have regard to the Government's Information Sharing Advice for Safeguarding Practitioners and its seven golden rules of information sharing when making decisions.
- 9.8.2 If staff are in doubt about sharing information, they must seek advice from the DSL, Deputy DSL, Headteacher or another appropriate senior leader without delay.

10. **RECOGNISING ABUSE, NEGLECT AND EXPLOITATION**

- 10.1 At Loreto College, St Albans we recognise that safeguarding concerns can affect any child and that early identification and intervention are key to supporting and protecting children and promoting their welfare.
- 10.2 All staff receive safeguarding training and are expected to remain vigilant to the signs and indicators of abuse, neglect, exploitation and other safeguarding concerns. Staff understand that children can be harmed by adults or by other children, and that abuse can occur within families, peer groups, educational settings, communities and online environments.
- 10.3 Staff should exercise professional curiosity, be alert to changes in a child's presentation, behaviour, attendance, emotional wellbeing or relationships, and report concerns promptly to the Designated Safeguarding Lead (DSL).
- 10.4 We recognise that safeguarding concerns rarely occur in isolation and that children may experience multiple and overlapping vulnerabilities. All concerns will be considered within the context of the child's lived experience and wider circumstances.
- 10.5 **Children Who May Benefit from Early Help or Additional Support**
- 10.5.1 Any child may benefit from Early Help, Family Help or additional support; however, staff should be particularly alert to children who:
- are disabled or have additional health needs;

- have Special Educational Needs and Disabilities (SEND);
- have identified mental health needs;
- are young carers;
- are young parents or pregnant;
- are displaying concerning, abusive or harmful behaviours;
- are vulnerable to exploitation, including criminal or sexual exploitation, county lines, trafficking or modern slavery;
- are vulnerable to radicalisation or extremism;
- frequently miss education, home or care;
- have experienced multiple suspensions or are at risk of exclusion;
- live in families affected by domestic abuse, substance misuse, parental mental ill health or parental offending;
- misuse drugs or alcohol;
- are at risk of honour-based abuse, including Female Genital Mutilation (FGM) or Forced Marriage; or
- are privately fostered.

10.6 Extra-Familial Harm and Online Safety

10.6.1 Our school recognises that children may experience harm outside the family home, this may include:

- child sexual exploitation (CSE);
- child criminal exploitation (CCE);
- county lines;
- serious youth violence;
- domestic abuse and teenage relationship abuse;
- sexual violence, sexual harassment and harmful sexual behaviour;
- financial exploitation;
- radicalisation and extremism.

10.6.2 Staff also recognise that safeguarding incidents can occur online or be facilitated through technology. Online risks may occur independently of, or alongside, offline abuse. Concerns relating to online safety will be managed in accordance with the school's safeguarding and online safety procedures. See section 11 Online Safety.

10.6.3 The school recognises that children can abuse other children. Such behaviours, including sexual harassment, harmful sexual behaviour, bullying, discriminatory behaviour, coercion, and the sharing of nude or semi-nude images, will be addressed through a safeguarding approach and not treated solely as behavioural issues.

10.7 Definitions of Abuse

10.7.1 Abuse is a form of maltreatment of a child. A child may be abused by inflicting harm or by failing to act to prevent harm.

10.7.2 Harm includes physical, emotional, sexual and psychological ill-treatment, including the impact of seeing, hearing or experiencing the effects of abuse towards others.

10.7.3 Domestic Abuse can have a significant impact on a child's health, development and wellbeing, including where a child sees, hears or experiences its effects.

10.7.4 The four recognised categories of abuse are:

- Physical abuse
- Emotional abuse
- Sexual abuse

- Neglect

10.7.5 The indicators and definitions set out below are based on *Keeping Children Safe in Education* and *Working Together to Safeguard Children*.

10.8 Categories of abuse

Category of abuse (what staff should know)	Indicators (what staff should look out for)
Physical Abuse is 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 (Fabricated Induced Illness FII). All suspicious bruising or injuries must be: • Reported immediately to the DSL or Deputy DSL. • Recorded accurately using a body map. • Added to the child's safeguarding records. • DSL to share with Children's Services and/ or police where appropriate.	<i>Remember that no single sign proves abuse, but a pattern of indicators may warrant concern.</i> Physical Indicators: • Unexplained bruises, welts, or black eyes • Bruises in unusual locations (ears, neck, cheeks, upper arms, thighs, torso) • Injuries at different stages of healing • Burns, including cigarette burns or immersion burns • Bite marks • Fractures or sprains with unclear explanations • Frequent injuries or repeated visits for medical treatment • Injuries that are inconsistent with the explanation given Behavioural Indicators: • Fearfulness, anxiety, or extreme withdrawal • Flinching when approached or touched • Being overly watchful or startled easily • Reluctance to go home or be around a particular person • Aggressive behaviour or sudden emotional outbursts • Low self-esteem or signs of depression • Wearing clothing that conceals injuries, especially in warm weather Indicators in Children • Frequent absences from school • Fear of parents or caregivers • Age-inappropriate behaviour (either very withdrawn or very aggressive) • Lack of explanation for injuries or changing explanations • Difficulty sitting, walking, or moving due to injuries Bruising and Physical Injury Concerns HSCP has updated its Bruising Policy for Children Over Six Months following learning from reviews and the October 2024 Joint Targeted Area Inspection on Domestic Abuse. This is in addition to HSCP Bruising protocol for infants under the age of 6 months old.

	Staff should be particularly alert to bruising on areas such as the face, neck, torso, buttocks, upper arms, inner thighs and genital area. Staff must also be aware of cumulative harm, where a series of incidents or injuries over time may indicate significant safeguarding concerns, even when individual incidents appear minor.
Category of abuse (what staff should know)	Indicators (what to look and listen out for)
Emotional abuse may include verbal abuse, such as persistent criticism, belittling, name-calling, humiliation, intimidation or rejection. The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve: • Emotional abuse may include verbal abuse, such as persistent criticism, belittling, name-calling, humiliation, intimidation or rejection. • Conveying to a child that they are worthless or unloved, inadequate, or valued only as far as they meet the needs of another person. • Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. • Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. • A child seeing or hearing the ill-treatment of another. • Serious bullying (including cyberbullying). • Causing a child to feel frightened or in danger. • Exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. It can be difficult to recognise emotional abuse, and children may not always realise they are experiencing it. However, there may be indicators in the way a child behaves and reacts to certain situations.	Emotional and Psychological Signs • Low self-esteem or lack of confidence • Anxiety, fearfulness, or excessive worrying • Depression, sadness, or hopelessness • Feelings of worthlessness, shame, or guilt • Emotional withdrawal or becoming unusually quiet • Self-harm or suicidal thoughts Behavioural Indicators • Becoming isolated from friends, family, or usual activities • Appearing overly eager to please others • Difficulty making decisions independently • Sudden changes in personality or behaviour • Lack of confidence when speaking or expressing opinions • Excessive apologizing Signs in Relationships • Fear of upsetting a particular person • Being constantly criticized, belittled, or humiliated • Being blamed for things that are not their fault • Being controlled or monitored excessively • Being threatened, intimidated, or manipulated • Having little control over daily choices Indicators in Children and Young People • Delayed emotional development • Extreme compliance or excessive aggression • Poor attachment with parents or caregivers • Low self-confidence • Social withdrawal • Developmental regression, such as bedwetting or loss of previously acquired skills

Category of abuse (what staff should know)	Indicators (what to look and listen out for)
Sexual Abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether the child is aware of what is happening. The activities may involve: • Physical contact: including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. • Non-contact activities: such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse • Online 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.	Sexual abuse can affect children in different ways. Some children show obvious signs, while others show very few. No single indicator confirms abuse, but a combination of signs may raise concern. Behavioural Indicators • Sudden changes in behaviour or personality • Becoming withdrawn, anxious, or depressed • Increased aggression or anger • Self-harming behaviours • Running away from home • Reluctance to be alone with a particular person • Fear of certain places or people • Age-inappropriate sexual knowledge or language • Sexualised behaviour that is unusual for the child's age • Changes in eating or sleeping patterns • Nightmares or sleep disturbances Emotional Indicators • Low self-esteem • Feelings of shame, guilt, or worthlessness • Excessive secrecy • Emotional outbursts or mood swings • Loss of confidence • Difficulty trusting others Physical Indicators • Unexplained pain, soreness, or itching • Difficulty sitting or walking • Recurring urinary tract infections or genital infections • Bruising, bleeding, or injuries in genital or anal areas • Sexually transmitted infections • Pregnancy in a young person Educational and Social Indicators • Sudden decline in school performance • Poor concentration • Increased absences from school • Withdrawal from friends and activities • Difficulty forming or maintaining relationships Specific Indicators in Younger Children • Regression to earlier behaviours such as bedwetting • Clinginess or separation anxiety

	• Fearfulness that was not previously present • Excessive masturbation or sexual behaviours beyond developmental expectations
Category of abuse (what staff should know)	Indicators (what to look and listen out for)
Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because 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 caregivers). • Ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. HSCP Neglect Tool and / or 7-minute briefing Parental Neglect of Medical Needs	Physical Indicators • Poor personal hygiene • Unwashed clothing or consistently inappropriate clothing for the weather • Persistent hunger or stealing/hoarding food • Malnutrition or unexplained weight loss • Untreated medical or dental problems • Frequent illness or infections • Inadequate supervision leading to accidents or injuries • Tiredness or falling asleep frequently Developmental Indicators • Delayed physical, emotional, or intellectual development • Speech and language delays • Poor social skills • Failure to thrive in younger children Behavioural Indicators • Frequent absence from school or lateness • Poor concentration • Withdrawal or apathy • Attention-seeking behaviour • Low self-esteem • Lack of attachment to parents or caregivers • Taking on inappropriate caring responsibilities for siblings Emotional Indicators • Feeling unloved or uncared for • Anxiety, depression, or emotional withdrawal • Difficulty forming relationships • Lack of confidence or self-worth Home Environment Indicators • Unsafe or unhygienic living conditions • Lack of adequate heating, food, or bedding • Exposure to hazardous situations • Lack of supervision or appropriate caregivers Safeguarding Considerations for DSLs • Whether concerns are persistent and ongoing rather than isolated incidents. • The child's age, developmental stage, and individual circumstances. • The cumulative impact of unmet needs over time. A child may experience neglect even when there are no obvious physical signs. A pattern of unmet needs, poor care, and adverse

	effects on health, development, or wellbeing should always be taken seriously and reported in line with safeguarding procedures.
--	--

11. **ADDITIONAL INFORMATION – SAFEGUARDING ISSUES AND SPECIFIC FORMS OF ABUSE**

11.1 At Loreto College staff recognise that abuse, neglect, exploitation, and safeguarding risks can occur both within and outside the home, including online. Children may be vulnerable to multiple harms, including:

- Child abduction and community safety incidents
- Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)
- County Lines
- Children and the Court system
- Children absent from education.
- Children with family members in prison
- Cybercrime
- Domestic abuse
- Homelessness
- Modern Slavery and the National Referral Mechanism
- Preventing radicalisation
- The Prevent Duty
- Channel
- Serious Violence
- Honour or faith-based abuse (including female genital mutilation and forced marriage)
- FGM
- FGM mandatory reporting duty for teachers
- Forced marriage.
- Additional advice and support - There is a wealth of information and resources available in this chapter to support schools and colleges.

See KCSiE [Annex A Further information](#) this contains detailed information about what staff need to know and look out for.

11.2 **Child-on-Child Abuse (Including Sexual Harassment and Violence)**

11.2.1 At Loreto College, we recognise that children can abuse other children and that child-on-child abuse can occur inside and outside of school, as well as online. All staff understand that child-on-child abuse is a safeguarding issue and have a responsibility to identify, challenge and report concern in accordance with this policy. Child-on-child abuse may go unreported and should never be assumed not to be happening simply because no incidents have been disclosed.

- All concerns must be taken seriously and reported promptly to the Designated Safeguarding Lead (DSL) or Deputy DSL.
- Abuse should never be dismissed as "banter", "a joke", "part of growing up", or "boys being boys", as this can create an unsafe culture where harmful behaviour is normalised.
- Child-on-child abuse is a safeguarding concern for both the child who has experienced harm and the child displaying harmful behaviour.
- Early identification, intervention and education are essential in preventing harmful behaviour and promoting positive, respectful relationships.

11.3 **Child-on-child abuse may include, but is not limited to:**

- Bullying, including cyberbullying, prejudice-based and discriminatory bullying.
- Abuse within intimate personal relationships (including teenage relationship abuse).
- Physical abuse, including assault, threats of violence and harm involving weapons.
- Sexual violence, including rape, assault by penetration and sexual assault.
- Sexual harassment, including unwanted sexual comments, remarks, jokes and online sexual harassment.
- Harmful sexual behaviour and causing another child to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images.
- Upskirting.
- Initiation, hazing or ritual-based behaviours involving humiliation, abuse or coercion.
- Online abuse, including image-based abuse and technology-facilitated harm.

11.3.1 We recognise that child-on-child abuse can have a significant impact on a child's safety, welfare, wellbeing and educational outcomes. All concerns will be taken seriously, investigated appropriately and responded to promptly.

11.3.2 The school adopts a child-centred and trauma-informed approach to responding to child-on-child abuse. The safety, welfare and wishes of the child who has experienced harm will remain paramount, whilst appropriate support and intervention will also be considered for the child displaying harmful behaviour.

11.3.3 In most circumstances, incidences of pupils hurting other pupils will be dealt with under our school's behaviour policy. Our child protection policy will apply to all incidents that raise safeguarding concerns where the alleged behaviour:

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

11.4 **Domestic Abuse**

11.4.1 At Loreto College, we recognise the definition of domestic abuse set out in the [Domestic Abuse Act 2021](#), which identifies children who see, hear or experience the effects of domestic abuse as victims in their own right. Domestic abuse can occur between intimate partners, former partners, family members, within young people's relationships, and through child-to-parent abuse.

11.4.2 Staff are trained to recognise the signs of domestic abuse and understand the importance of early identification, support and multi-agency working. Abuse may be physical, sexual, emotional, psychological, financial, controlling or coercive, technology-facilitated, or involve stalking, harassment, honour-based abuse, [Violence Against Women and Girls \(VAWG\)](#), or [Child-to-Parent Violence and Abuse \(CPVA\)](#).

11.4.3 Staff should remain professionally curious and alert to indicators of domestic abuse. Any child can be affected, regardless of age, sex, gender identity, sexual orientation, ethnicity, disability, religion, culture or socio-economic background. Children who experience domestic abuse will be provided with appropriate safeguarding support and intervention.

11.5 **Female Genital Mutilation (FGM)**

- 11.5.1 **FGM** includes 'all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs.'
- 11.5.2 **FGM is illegal in the UK** and is considered as a form of child abuse that has significantly harmful and long-lasting consequences. It can also be referred to as 'female genital cutting,' 'circumcision' or 'initiation.'
- 11.5.3 At Loreto College staff are aware of their mandatory reporting duty and the requirement to immediately contact the Police if they are:
- Informed by a girl under 18 that an act of FGM has been carried out on her.
 - Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 (and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth).
- 11.5.4 The specific Mandatory reporting duty for teaching staff above (report directly to the police) does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. In these circumstances, staff know they must report to the DSL who would follow local statutory safeguarding procedures, this means share the information with children services so that a multi-agency view can be ascertained.
- 11.6 **Preventing Radicalisation**
- 11.6.1 At Loreto College, our staff recognise its duty under Section 26 of the Counterterrorism and Security Act 2015 (the Prevent Duty) to have due regard to the need to prevent people from being drawn into terrorism. Protecting children from radicalisation is part of the school's wider safeguarding responsibilities.
- 11.6.2 Staff understand that children may be vulnerable to extremist influences or radicalisation and are trained to identify signs of concern, including online influences. Extremism can take many forms, including ideologies associated with political, religious or other causes.
- 11.6.3 There is no single indicator that a child may be susceptible to radicalisation. Concerns should be reported to the Designated Safeguarding Lead (DSL), who will assess risk and make referrals as appropriate, including to Children's Services or the Channel Programme, which provides early support for individuals at risk of being drawn into terrorism.
- 11.6.4 The school follows current Prevent guidance and ensures that safeguarding procedures include the identification, assessment and appropriate management of concerns relating to extremism, radicalisation and terrorism.
- 11.7 **Mental Health**
- 11.7.1 At Loreto College, we recognise that mental health concerns may be an indicator that a child has experienced, or is at risk of, abuse, neglect, exploitation or other adverse experiences, and may also be a safeguarding concern in their own right. Staff should be alert to changes in a child's behaviour, presentation or emotional wellbeing and report concerns to the Designated Safeguarding Lead (DSL) or deputy DSL.
- 11.7.2 They will consider mental health concerns alongside wider safeguarding risks and work with the school's Mental Health Lead, families and relevant agencies to ensure appropriate support is provided at the earliest opportunity. Where a child presents with significant mental health needs, self-harm or suicidal ideation, appropriate safeguarding action and referrals will be made without delay.
- 11.7.3 At Loreto College, our Mental Health Lead plays a key role in promoting positive mental health and wellbeing across the school. They work closely with the DSL to identify needs,

coordinate appropriate support, provide advice to staff, engage with parents/carers and liaise with external agencies where required. The Mental Health Lead does not replace safeguarding procedures; any concerns that a child may be at risk of harm, abuse, neglect or exploitation will be managed through the school's safeguarding processes and overseen by the DSL.

- 11.7.4 More information can be found in the [Mental health and behaviour in schools' guidance](#), colleges may also wish to follow this guidance as best practice. The Department of Health and Social Care provide a range of resources to support schools in promoting positive health, wellbeing and resilience among children and young people. See [Better Health Every Mind Matters](#) for links to all materials and lesson plans.

[youth-suicide-prevention-7-minute-briefing-may-2023.pptx](#)

12. **ONLINE SAFETY AND FILTERING AND MONITORING**

- 12.1 At Loreto College St Albans we recognise the importance of safeguarding and promoting the welfare of children in the digital world. Technology is an essential part of everyday life and learning and is a significant factor in many safeguarding and wellbeing concerns, including child-on-child abuse, cyberbullying, exploitation, radicalisation, misinformation, and emerging harms associated with artificial intelligence (AI).

- 12.2 The Governing Body/Trust Board recognises its responsibility to ensure that appropriate filtering and monitoring systems are in place and regularly reviewed. The Designated Safeguarding Lead (DSL) will take lead responsibility for online safety, including understanding the effectiveness of filtering and monitoring systems and ensuring they are aligned with safeguarding procedures.

- 12.3 Our school aims to:

- Maintain robust processes, including appropriate filtering and monitoring systems, to safeguard pupils, staff, volunteers, governors, and visitors when using technology.
- Protect and educate the whole school community in the safe, responsible, and effective use of digital technologies, including mobile devices, social media, online platforms, smart technology and AI-enabled applications.
- Empower pupils to become digitally resilient and critical consumers of online information, enabling them to recognise risks and seek support when needed.
- Establish clear safeguarding procedures for identifying, reporting, managing and escalating online safety concerns.
- Ensure staff understand the safeguarding implications of emerging technologies, including generative AI tools.
- Promote a culture where online safety is recognised as a shared responsibility across the whole school community.

12.4 **The Four Categories of Online Risk**

- 12.4.1 In line with Keeping Children Safe in Education (KCSIE), our approach to online safety addresses the four categories of online risk:

Content	Contact
Exposure to illegal, inappropriate, or harmful content, including: • Pornographic content • Misinformation, disinformation, fake news and conspiracy theories • Extremist and radicalising material • Racist, misogynistic, homophobic, transphobic or discriminatory content • Self-harm, suicide and eating disorder content AI-generated harmful, misleading, or manipulated content, including deepfakes and synthetic media	• Being subjected to harmful online interaction, including: • Grooming and child sexual exploitation • Criminal exploitation • Adults posing as children or young people • Online coercion and manipulation • Harmful interactions through social media, gaming platforms, messaging services or AI-powered chatbots Unwanted commercial advertising or marketing
Conduct	Commerce
Behaviour online that causes, or increases the likelihood of, harm, including: • Cyberbullying • Online harassment and hate incidents • Sharing or creating explicit content • Consensual and non-consensual sharing of nude and semi-nude images • Misuse of AI to create manipulated, abusive or harmful content • Sharing inappropriate images, videos or personal information Online behaviours that place a child or others at risk	Risks associated with online financial activity, including: • Phishing scams • Fraud and financial exploitation • Gambling • Misleading advertising • Subscription traps and in-app purchases • AI-enabled scams and impersonation attempts

12.5 Artificial Intelligence (AI)

- 12.5.1 The school recognises that generative AI technologies, including AI chatbots, image generators and other AI-powered tools, are becoming increasingly accessible to children and young people. Whilst these technologies present educational opportunities, they also introduce safeguarding, privacy, and reliability risks.

The school will:

- Take a risk-based approach to the use of AI technologies.
- Teach pupils how to use AI safely, critically and responsibly.
- Educate pupils about the limitations of AI-generated content, including bias, inaccuracies, misinformation and fabricated information.
- Raise awareness of AI-related safeguarding risks, including deepfakes, AI-generated images, online impersonation, grooming and exploitation.
- Ensure staff understand the safeguarding implications of AI and know how to identify and respond to concerns involving AI-generated content.
- Ensure personal, sensitive or confidential information is not entered into AI tools unless approved and compliant with data protection requirements.
- Monitor developments in AI technology and review safeguarding arrangements accordingly.
- Education and Prevention

12.6 Online safety

- 12.6.1 We embed throughout our curriculum and wider safeguarding culture. Pupils will be taught age-appropriate knowledge and skills including:

- Safe use of the internet, social media and digital technologies
- Digital citizenship and responsible online behaviour

- Online relationships and consent
- Privacy and protecting personal information
- Information literacy, including recognising misinformation and AI-generated content
- Reporting concerns and seeking support
- Recognising grooming, exploitation and coercive behaviour
- Understanding the risks associated with sharing images online
- Responsible and ethical use of AI technologies

12.7 **Staff online safety Training**

12.7.1 All staff will receive online safety training, including as part of their induction, this includes:

- The school's online safety expectations
- Their safeguarding responsibilities relating to online safety
- The operation and role of filtering and monitoring systems
- Cyberbullying and online abuse
- Online radicalisation and extremism
- Emerging technologies and AI-related safeguarding risks
- Reporting and recording online safety concerns
- Staff will receive regular safeguarding and online safety updates and refresher training at least annually.
- Working with Parents and Carers

12.7.2 We endeavour to work in partnership with parents and carers by:

- Providing information and guidance on online safety and emerging digital risks.
- Sharing resources relating to social media, gaming platforms and AI technologies.
- Communicating procedures for reporting concerns.
- Encouraging consistent online safety messages between home and school.

12.8 **Mobile Phones, Cameras and Digital Devices**

12.8.1 We maintain clear expectations regarding the use of personal devices.

12.8.1.1 Staff:

- May bring personal mobile phones onto site in accordance with school procedures.
- Must not use personal devices to photograph, record or store images of pupils.
- Must comply with the staff code of conduct and acceptable use policies.
- Pupils:
- Must comply with the school's mobile phone and acceptable use policies.
- Will be subject to appropriate sanctions where policies are breached.

12.9 **Acceptable Use**

12.9.1 We ensure that:

- Staff, pupils, volunteers, governors and, where appropriate, parents/carers sign or agree to acceptable use agreements.
- Expectations regarding the use of school technology, internet access, mobile devices and AI tools are clearly communicated.
- Breaches are managed in accordance with safeguarding, behaviour and disciplinary procedures.

12.10 **Filtering and Monitoring**

12.10.1 Our Governing Body/Trust Board and Headteacher will ensure that filtering and monitoring systems:

- Are effective, proportionate and appropriate to the school's safeguarding needs.
- Safeguard pupils from harmful and inappropriate content.
- Support the identification of safeguarding concerns.
- Are reviewed regularly, and at least annually, as part of the school's safeguarding and online safety arrangements.
- Consider emerging risks, including AI-enabled content and applications.
- Are understood by safeguarding leads, senior leaders and those responsible for IT provision.
- The DSL will work closely with senior leaders, governors and IT providers to ensure filtering and monitoring arrangements remain effective, appropriate and proportionate to the level of risk.

12.11 Searching, Screening and Confiscation

12.11.1 Where there is a safeguarding concern or suspicion that a pupil's device contains evidence relating to an offence, harmful content or a risk of harm, authorised staff may search, screen or confiscate devices in accordance with current DfE guidance and school procedures. Where appropriate, external agencies, including the police, will be involved.

12.12 Monitoring, Review and Evaluation

12.12.1 The school will:

- Conduct an annual online safety risk assessment.
- Review filtering and monitoring arrangements at least annually.
- Review safeguarding and child protection policies, including online safety, every year.
- Consider emerging technologies, including AI, when assessing safeguarding risks.
- Ensure lessons learned from incidents are reflected in future practice and policy development.

Key statutory and non-statutory guidance:

- [Keeping Children Safe in Education \(KCSIE\) 2026.](#)
- [DfE: Generative Artificial Intelligence \(AI\) in Education.](#)
- [DfE Filtering and Monitoring Standards for Schools and Colleges.](#)
- [Teaching Online Safety in Schools \(DfE\).](#)
- [UK Safer Internet Centre Guidance.](#)
- [Working Together to Safeguard Children.](#)

13. **RESPONDING TO SAFEGUARDING CONCERNS**

13.1 At Loreto College we adopt a whole-school, child-centred approach to safeguarding and recognise that safeguarding is everyone's responsibility. All staff, including trainee teachers, supply staff, contractors, governors, volunteers and visitors, have a duty to safeguard and promote the welfare of children.

13.2 All adults working within the school must:

- Remain vigilant and maintain an attitude of "it could happen here".
- Act in the best interests of the child at all times.
- Be aware of the indicators of abuse, neglect, exploitation and safeguarding concerns.

- Listen to children, take their concerns seriously and reassure them that they will receive help and support.
- Record concerns accurately, factually and promptly using CPOMS.
- Report any safeguarding concern, disclosure or allegation immediately to the Designated Safeguarding Lead (DSL) or a Deputy DSL.
- Understand that anyone can make a referral to Children's Services if they believe a child is at risk of significant harm. This can be done via HSCP portal [Hertfordshire Safeguarding Children Partnership | Hertfordshire County Council](#)
- Follow the school's safeguarding procedures and code of conduct at all times.
- Share concerns without delay, even where there is uncertainty, and never assume that another person has taken action.
- Recognise that safeguarding concerns may arise in relation to a child's home life, peer relationships, online activity, mental health or wider community experiences.

13.3 Where there is a concern that a child is suffering, or is likely to suffer, significant harm, immediate action must be taken. Staff should not investigate concerns themselves but must report them promptly to the DSL, who will determine the appropriate course of action in accordance with local safeguarding procedures.

13.4 The school promotes a culture of professional curiosity, openness and transparency, ensuring that children are listened to, concerns are acted upon and safeguarding remains at the heart of all decision-making.

13.5 **If a child makes a disclosure to any person/ adult in the school:**

13.5.1 If a child makes a disclosure to a member of staff or volunteer, all staff understand that children may disclose abuse, neglect or exploitation at any time and to any trusted adult. Staff should always be prepared to listen, respond appropriately and follow the school's safeguarding procedures without delay.

13.5.2 At Loreto College we are committed to a child-centred, inclusive and trauma-informed approach to safeguarding. We recognise that every child has the right to be heard, protected and supported. We value and promote the voice, wishes and feelings of all children and understand that some children may face additional barriers to communication, disclosure or seeking help.

13.5.3 We recognise that children and families may have differing needs, experiences, communication styles, cultural backgrounds, languages and levels of understanding. Some children, including those with Special Educational Needs and Disabilities (SEND), speech, language and communication needs, neurodivergence, mental health needs, disabilities, or those who speak English as an additional language (EAL), may require additional support to express their views, wishes and feelings. Staff will ensure that appropriate support, communication methods and reasonable adjustments are in place so that every child can be listened to and understood.

13.6 **All our staff understand that children may not always:**

- Recognise that they are experiencing abuse, neglect or exploitation.
- Feel ready to disclose their experiences.
- Know who to tell or how to ask for help.
- Use language that clearly communicates what has happened.
- Communicate verbally, particularly where SEND, disability, trauma or communication difficulties are present.

Staff will therefore remain professionally curious and take all concerns seriously, recognising that behaviour, presentation, attendance, emotional wellbeing or communication may indicate that a child needs help or protection.

13.7 When Listening to a Child, our staff will:

- Remain calm, patient, attentive and non-judgemental.
- Give the child time and space to talk at their own pace.
- Listen carefully and allow the child to use their own words.
- Adapt their communication to meet the child's individual needs and level of understanding.
- Use appropriate communication tools, interpreters or specialist support where required.
- Avoid interrupting, investigating or asking leading questions.
- Use open questions and prompts only where clarification is necessary.
- Accept and respect the child's account without expressing shock, disbelief or judgement.

13.8 Our staff will reassure children by:

- Taking what they say seriously.
- Thanking them for speaking up and seeking help.
- Reassuring them that they have done the right thing.
- Making it clear that the abuse or harm is not their fault.
- Being honest about the need to share information with safeguarding professionals to keep them safe.
- Explaining, in an age and developmentally appropriate way, what may happen next.
- Providing ongoing support and ensuring that the child knows who they can talk to if they remain worried or have further concerns.

The child's safety, welfare, wishes and best interests will remain central to all decisions and actions taken following a disclosure.

13.9 Recording concerns

13.9.1 Accurate, timely and professional recording is a vital safeguarding responsibility and plays a key role in protecting children at (Insert name of school). Effective recording enables concerns to be identified, patterns of harm or neglect to be recognised, information to be shared appropriately, and timely decisions to be made in the best interests of the child. Staff should be aware that serious case and safeguarding practice reviews frequently highlight poor recording, fragmented information and delays in sharing concerns as factors that can leave children at increased risk of harm.

13.9.2 All safeguarding concerns, disclosures, incidents, welfare concerns and observations, no matter how small they may appear, must be recorded promptly on the school's safeguarding recording system CPOMS and reported to the Designated Safeguarding Lead (DSL) or Deputy DSL without delay.

13.10 Staff must:

- Record concerns as soon as possible after the event or disclosure.
- Make clear, factual, accurate and objective records.
- Use the child's own words wherever possible when recording disclosures.
- Distinguish clearly between fact, observation, opinion and professional judgement.
- Include relevant dates, times, locations, witnesses and actions taken.
- Record concerns even where they appear low-level, as a series of seemingly minor incidents may indicate cumulative harm, abuse, neglect or exploitation.
- Report concerns immediately and not wait until additional information becomes available.

- Maintain appropriate confidentiality and only share information through established safeguarding processes.

Staff should not investigate concerns themselves or discuss safeguarding information with colleagues unless this forms part of the agreed safeguarding process or has been authorised by the DSL. This ensures information is shared appropriately, protects the privacy of children and families, and enables the DSL to build a complete picture of risk using all available information.

13.11 Our schools DSL will

- Review all available information and identify any patterns, cumulative concerns or indicators of abuse, neglect or exploitation.
- Gather relevant information from staff, the child, parents/carers and other agencies, where appropriate.
- Consider the child's voice, wishes and feelings as part of any decision-making process.
- Involve parents/carers unless doing so may place the child at increased risk of harm or prejudice a safeguarding enquiry.
- Determine whether support can be provided through school-based interventions, Early Help or Family Help services.
- Make referrals to Children's Services, the Police or other agencies where thresholds for intervention are met.
- Ensure all decisions, actions and outcomes are recorded clearly and retained in accordance with safeguarding and data protection requirements.

Where a child is suffering, or is likely to suffer, significant harm through abuse, neglect or exploitation, the DSL will make an immediate referral to Children's Services and, where appropriate, the Police. Referrals will be made without delay and in accordance with Hertfordshire safeguarding procedures.

13.12 How Children's Services respond

13.12.1 Following a referral, the **Hertfordshire Front Door (Children's Services Gateway)** will review the information provided and determine the most appropriate response for the child and family. This may include:

- Providing advice, signposting or support through **Family Help/Early Help services**.
- Undertaking further assessment to determine the child's needs and the most appropriate level of intervention.
- Assessing whether the child is a **Child in Need** under Section 17 of the Children Act 1989.
- Making enquiries under Section 47 of the Children Act 1989 where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.
- Taking immediate protective action where a child is assessed to be at risk of significant harm.
- Working with partner agencies, including schools, health services and the police, to safeguard and promote the welfare of the child.
- The Designated Safeguarding Lead (DSL) will work collaboratively with Children's Services and other agencies, sharing information as appropriate and participating in assessments, meetings and plans to support the child.
- If the DSL does not receive confirmation that a referral has been received or acted upon, they will follow up promptly in accordance with local safeguarding procedures.

13.12.2 The DSL has lead responsibility for referrals, but responsibility for safeguarding does not sit solely with the DSL. Any member of staff can and should make a referral if a child is at risk and they feel a referral is required. particularly if:

- the DSL is unavailable,
- there would be an undue delay in making a referral,
- or if staff feel appropriate action is not being taken.

If a child is in **immediate danger**, anyone should contact the police by calling **999**

13.12.3 The DSL has lead responsibility for referrals, but responsibility for safeguarding does not sit solely with the DSL. Any member of staff can and should make a referral if a child is at risk and they feel a referral is required. particularly if:

- the DSL is unavailable,
- there would be an undue delay in making a referral,
- or if staff feel appropriate action is not being taken.

If a child is in **immediate danger**, anyone should contact the police by calling **999**

13.13 **Making a referral to Children's Services and/or requesting support**

13.13.1 We use Hertfordshire Safeguarding Children Partnership [website](#) to make online referrals for children we have concerns about (**consent** is needed from parents and carers, however if we considered this would place a child at risk, we would record our reason for not seeking consent).

13.13.2 We want all staff and stakeholders to know that if someone is in danger or a crime has been committed, we all have a duty to call the **Police on 999**.
Out of hours (17:30-08:00 and weekends) **call 0300 123 4043**.

Members of the public in this context (non-school staff), parents, carers, children, and young people can call Children's Services at any time of the day or night on **0300 123 4043**.

This link provides leaflet for parents and carers [HSCP Family Leaflet \(hertfordshire.gov.uk\)](#).

You can contact the NSPCC Helpline by calling 0808 800 5000 or email help@nspcc.org.uk
Adapt the above to reflect arrangements in your setting and include any additional information as below that is relevant:

13.14 **What Children Need to Know About Reporting Concerns**

13.14.1 At Loreto College we want all children and young people to know that they can talk to us about anything that is worrying them. We will always listen, take concerns seriously and help them to access the support they need.

13.15 **When a child shares a concern, we will:**

- Listen carefully and respectfully.
- Take their worries seriously.
- Explain what will happen next.
- Be honest about the need to share information if someone is at risk of harm.
- Work with them and their family, where appropriate, to secure the right support.
- Help them feel safe, supported and listened to.

13.15.1 Children can speak to any member of staff, who will ensure their concern is passed to the Designated Safeguarding Lead (DSL) or Deputy DSL.

Children can also seek help directly by contacting:

- **Hertfordshire Children's Services:** 0300 123 4043
- **Police:** 999 in an emergency or if they are in immediate danger.

13.15.2 We encourage all children to speak to a trusted adult if they are worried about themselves or someone else. No concern is too small to share.

13.15.3 There are posters around the whole of the school site showing the pupils who the DSLs are and giving details on how they can make a report. The Sharp system is an easy way for pupils to report concerns from a computer or smart phone. Pupils are given the choice of including their details or sending an anonymous concern.

13.16 **Risk Management Plan (RAMP) and Safety and Support Plan (S&SP)**

13.16.1 When a report of sexual violence or sexual harassment is made, the Designated Safeguarding Lead (DSL) or deputy will carry out an immediate assessment of the risks and needs of both the alleged victim and alleged perpetrator. The purpose of the RAMP is to identify risks, understand the needs of the children involved, and put appropriate measures in place to keep them safe from further harm. Assessments are recorded and regularly reviewed.

13.16.2 The RAMP does not replace specialist assessments but is informed by information from relevant agencies to ensure a coordinated, multi-agency approach to safeguarding. It recognises the significant emotional, social, and educational impact that sexual violence and harassment can have on victims and their families, particularly where those involved attend the same school. Each case is assessed individually, with actions tailored to the level of risk and need.

13.16.3 The process is guided by statutory requirements set out in Keeping Children Safe in Education (KCSIE), Part Five. Responsibility for implementing and overseeing the RAMP rests with the school's leadership team, working in partnership with parents and carers. The framework also supports the management of Harmful Sexual Behaviour (HSB) and other safeguarding concerns affecting vulnerable children and young people.

13.17 **Risk Assessment Management Plan (RAMP)**

13.17.1 The RAMP is used when there has been a report of sexual violence, sexual harassment, or harmful sexual behaviour (HSB). The Designated Safeguarding Lead (DSL) or deputy carries out an immediate assessment of the risks and needs of both the alleged victim and alleged perpetrator.

13.17.2 The purpose of the RAMP is to:

- Identify and assess risks to children and young people.
- Consider the needs, strengths, and vulnerabilities of those involved.
- Put measures in place to reduce risk and prevent further harm.
- Support informed decision-making through critical analysis and professional judgement.
- Record, monitor, and regularly review safeguarding arrangements.

13.17.3 The RAMP is informed by information from other agencies where appropriate, ensuring a multi-agency and holistic approach to safeguarding. It recognises that experiences of sexual violence and harassment can have a significant impact on a child's wellbeing, family life, and educational attainment, particularly when the individuals involved attend the same school.

13.17.4 The framework helps DSLs to:

- Assess risk and need where harmful sexual behaviour is present.

- Use evidence-based guidance and multi-agency information to analyse risk and protective factors.
- Develop, implement, monitor, and review day-to-day safeguarding plans.

13.17.5 The RAMP operates in line with statutory guidance outlined in Keeping Children Safe in Education (KCSIE), Part Five: Child-on-child Sexual Violence and Sexual Harassment.

13.18 **Safety and Support Plan (S&SP)**

13.18.1 The Safety and Support Plan (S&SP) is used for a wider range of safeguarding concerns and specific forms of abuse or harm, including vulnerabilities identified in Keeping Children Safe in Education (Part One and Annex B).

13.18.2 The S&SP is designed to:

- Assess the needs and risks of children and young people experiencing safeguarding concerns, including all forms of child-on-child abuse.
- Support DSLs with evidence-based guidance and a multi-agency approach to understanding risks and strengths.
- Create practical day-to-day support plans that safeguard children, promote their welfare, and monitor progress over time.

13.18.2 Where concerns involve high-level problematic sexual behaviour or harmful sexual behaviour, the RAMP should be used instead of the S&SP.

13.19 **Key Difference**

- **RAMP:** Used specifically for cases involving **sexual violence, sexual harassment, or harmful sexual behaviour**, where a more detailed risk assessment and management approach is required.
- **S&SP:** Used for **broader safeguarding concerns and vulnerabilities**, providing ongoing support and safety planning for children and young people.

Both frameworks aim to protect children, promote their welfare, and ensure safeguarding decisions are regularly reviewed and informed by multi-agency working.

14. **MANAGING SAFEGUARDING CONCERNS AND ALLEGATIONS AGAINST ADULTS**

14.1 At Loreto College, we start from the premise of having confidence and trust in the people we employ and engage to work with our children and young people. However, we recognise that maintaining a strong safeguarding culture requires openness, transparency, and professional curiosity. As such, all concerns, low-level concerns, and allegations relating to the conduct or behaviour of adults working or volunteering with children will be taken seriously, recorded appropriately, and responded to in a timely, proportionate, and fair manner.

14.2 Our approach seeks to safeguard children and young people, support staff to maintain high standards of professional conduct, and ensure that concerns are identified and addressed at the earliest opportunity. We are committed to creating an environment where all members of the school community feel confident to raise concerns without fear of reprisal, knowing that they will be managed sensitively, fairly, and in accordance with statutory guidance and local safeguarding procedures.

14.3 Concerns regarding the conduct of adults working or volunteering with children are managed through one of two processes:

- **Low-Level Concerns:** Used when behaviour does not meet the threshold for an allegation but may be inconsistent with the staff code of conduct or could indicate emerging concerns.
- **Allegations Against Staff:** Used where it is alleged that an adult has behaved in a way that has harmed a child, may have harmed a child, possibly committed a criminal offence against a child, or behaved towards a child in a way that indicates they may pose a risk of harm.

Both processes are designed to promote a culture of openness, transparency, and safeguarding, ensuring concerns are identified, managed, and escalated appropriately in line with statutory guidance for example:

- [Keeping Children Safe in Education \(KCSiE\)](#)
- [Working Together to Safeguard Children](#)
- Hertfordshire Safeguarding Children Partnership Procedures Manual, [Section 5.1.5 Managing Allegations Against People who work with Children and Young People](#)
- The Teachers' Standards and Staff Code of Conduct (where applicable)
- Relevant employment and safeguarding legislation.
- [Developing and implementing a low-level concerns policy \(Farrer & Co\)](#), which provides detailed guidance and examples.

- 14.4 This section should be read alongside Staff **Behaviour Policy/Code of Conduct** and Section 14: Safer Recruitment.
- 14.5 All staff, governors, trustees, contractors, and volunteers are in a **position of trust** and are expected to maintain professional boundaries and high standards of conduct at all times. A position of trust exists where an adult, through their role, has responsibility for, authority over, or influence on a child or young person.
- 14.6 Under the [Sexual Offences Act 2003](#), it is a criminal offence for a person in a position of trust to engage in sexual activity with a child in their care, including those aged 16 or 17.
- 14.7 A **breach of trust** occurs when an adult misuses their position to develop an inappropriate relationship with a child or young person. This may include personal, romantic, sexual, or otherwise inappropriate contact, including through social media. Such behaviour may constitute a safeguarding concern even where it is not criminal or where the young person is over the age of consent.
- 14.8 Any breach of trust undermines professional integrity, compromises safeguarding, and is likely to result in disciplinary action and, where appropriate, referral to external agencies or criminal investigation. Adults must always maintain clear and appropriate professional boundaries with children
15. **MANAGING SAFEGUARDING CONCERNS OR ALLEGATIONS MADE ABOUT STAFF, INCLUDING SUPPLY TEACHERS, VOLUNTEERS AND CONTRACTORS**
- 15.1 Loreto College 'low-level concern and allegations policy' is compliant with:
- [KCSiE, Part four](#)
 - Hertfordshire Safeguarding Children Partnership Procedures Manual, [Section 5.1.5 Managing Allegations Against People who work with Children and Young People](#)
 - [Developing and implementing a low-level concerns policy \(Farrer & Co\)](#), which provides detailed guidance and examples.
- 15.2 This section of our policy is a reflection and extension of Loreto College, St Albans wider staff code of conduct.

- 15.3 All staff and volunteers at Loreto College, St Albans hold positions of trust and are expected to uphold safe working practices outlined in our staff code of conduct.
- 15.4 A 'position of trust' refers to any role where an adult holds power or influence over a child due to the nature of their work (either paid or voluntary). As defined in the [Sexual Offences Act 2003 \(Sections.16-24\)](#) and further clarified by the [Crown Prosecution Service](#), **it is a criminal offence for anyone in a position of trust to engage in sexual activity with a child in their care – even if that child is aged 16 or 17 and legally considered to have reached the age of sexual consent (16)**; this includes both in-person and online interaction, within or outside of employed/voluntary hours.
- 15.5 A **breach of trust** occurs when an adult working or volunteering with children crosses established boundaries in their professional relationship with a child or young person through inappropriate behaviour that involves an abuse of their position or authority. The behaviour itself does not need to be illegal to constitute a breach of trust – even when the child or young person is over the age of consent (16). Examples include:
- A 19-year-old Youth Worker at a youth club initiating a personal relationship with a 16-year-old club member.
 - A teacher engaging in an intimate or sexual relationship with a Sixth-Form student.
- 15.6 These behaviours undermine professional integrity and breach safeguarding standards and Loreto College, St Albans's staff code of conduct regardless of legal consent due to the imbalance of power and the professional duty of care.
- 15.7 [Section 11 of the 2004 Children's Act](#) states that schools and colleges should have clear policies aligned with HSCP Procedures for dealing with safeguarding concerns or allegations against those working in or on behalf of schools and colleges in a paid or unpaid capacity, i.e. members of staff, including supply teachers, volunteers and contractors. These policies must clearly distinguish between:

Allegations – a claim or assertion that someone has done something illegal or wrong, typically one made without proof. The *Harm Threshold* (see section *Managing Allegations*, below) for an allegation is when a person working or volunteering with children in a position of trust has or may have:

- Behaved in a way that has, or may have harmed a child/young person;
- Possibly committed a criminal offence against/related to a child/young person;
- Behaved toward a child/young person in a way that indicates he or she would pose a risk of harm;*
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children/young people;*

**These categories can include behaviour that may have happened outside of an organisation that might make an individual unsuitable to work with children/young people.*

Concerns about the quality of care/practice - is an accusation, not of a child protection nature, that the care/practice provided does not meet the expected standards. As with quality in other fields, it is an assessment of whether something is good enough and whether it is suitable for its purpose.

Complaints – an expression of dissatisfaction about actions or the lack thereof. Concerns may reflect a worry requiring reassurance, while complaints assert that something is unacceptable

15.8 Levels of Concern and Allegation

15.8.1 There are two levels of Concerns and Allegations relating to adults (in both paid and voluntary roles) working with children either directly and/or online:

- **Low-Level Concerns**

These are behaviours by one or more adults (paid or voluntary) which are inconsistent with Loreto College, St Albans's staff code of conduct but do not meet the Harm Threshold (see above under definition of Allegations) and are referred to as 'Low-Level Concerns'. Examples include repeated breaches of Loreto College's staff code of conduct in relation to safeguarding.

- **Allegations**

These are behaviours by one or more adults (paid or voluntary) that do meet or may meet the Harm Threshold (see above under definition of Allegations). Such cases require referral within **one working day** to the **Local Authority Designated Officer (LADO)** and potentially other statutory bodies such as the police or children's social care.

15.8.2 Low-Level Concerns and Allegations may emerge as a result of either observed suspicions or direct disclosures made by a child. In assessing the potential harm and impact to a child or young person, DSLs will consider the four categories of abuse – physical, emotional, sexual and neglect – as well as any safeguarding elements related to exploitation. Detailed definitions of these terms can be found in Chapters 4 and 9 on this policy.

15.8.3 The Harm Test is explained in the Disclosure and Barring service Guidance: [Making barring referrals to the DBS and Section 31\(9\) of the Children Act 1989 \(as amended by the Adoption and Children Act 2002\)](#).

15.9 **Managing Low-Level Concerns** (those that DO NOT meet the Harm Threshold for Allegation)

15.9.1 As part of our whole-school approach to safeguarding, we are committed to fostering an open and transparent culture where all concerns involving adults working in or on behalf of Loreto College, St Albans (including supply teachers, volunteers, and contractors) are addressed promptly and appropriately.

15.9.2 Creating an environment where all concerns can be shared responsibly, with the right person, recorded accurately, and handled with care is essential to keeping our children and young people safe.

15.9.3 We aim to:

- Enable all stake holders to identify inappropriate, problematic, or concerning behaviour early and encourage them to do so.
- Reduce the risk of abuse by acting preventatively.
- Ensure that all adults working/volunteering in or on behalf of our school understand and adhere to professional boundaries consistent with our ethos and values at Loreto College, St Albans.

15.9.4 A 'Low-Level' Concern does not imply insignificance. It refers to any behaviour – however minor – that causes a sense of unease or a 'nagging doubt' about whether an adult's behaviour:

- Is inconsistent with Loreto College St Albans's code of conduct, including inappropriate conduct outside of work, and

- Does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples may include (but are not limited to):

- Being over-friendly with children.
- Having favourites or showing preferential treatment towards specific pupils.
- Taking photographs or videos of children on a personal mobile phone or device, contrary to school policy.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door without a clear professional reason.
- Humiliating, belittling, or intimidating children.
- Mishandling children, including using inappropriate physical intervention.
- Using inappropriate, offensive, sexualised, or discriminatory language in the presence of children.
- Sharing personal information with pupils or encouraging them to share personal information unnecessarily.
- Contacting or communicating with pupils through personal social media accounts, messaging apps, or personal devices.
- Giving a child personal gifts, money, or special treatment without approval or a clear professional reason.
- Spending excessive time with a particular child or creating an inappropriate dependency.
- Transporting a child in a personal vehicle without prior authorisation or appropriate safeguards.
- Failing to maintain professional boundaries online or in person.
- Making inappropriate jokes, comments, or remarks that could be viewed as unprofessional.
- Entering personal, secretive, or overly familiar communications with a child or young person.
- Not following school safeguarding, behaviour, or safer working practice procedures. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

15.10 The role of the Case Manager for Low-Level Concerns

15.10.1 In our school, the Case Manager is the Headteacher. If concerns involve the Headteacher, the Chair of Governors fulfils this role.

15.10.2 When a Low-Level Concern is raised (including third-party reports), the Case Manager or their nominated deputy will:

- Speak with the person who raised the concern (unless this was raised anonymously)
- Speak with the individual subject to the concern
- Identify and interview any other involved parties or witnesses

15.10.3 The information gathered will help us to categorise the type of behaviour and determine what further action may need to be taken. This information will be recorded in writing along with the rationale for our decisions and action taken.

15.10.4 The Case Manager, a nominated deputy, or Chair of Governors will respond to reports of Low-Level Concerns in-line with the schools' internal due processes for managing safe-staffing, our response may include the following:

- Prioritise the safety and wellbeing of any alleged victim and all other pupils
- Share details only with those who need to know to maintain confidentiality
- Conduct further inquiries with relevant children, staff, parents, or witnesses
- If there are reasonable grounds, launch a formal internal investigation following the school's internal processes
- Consult Human Resources on possible breaches of the Loreto College, St Albans staff code of conduct [Teachers' Standards](#), or TA regulations to assess disciplinary thresholds
- Inform the subject of the concerns and outline available support during the inquiry
- Determine when to allow the subject to present their account
- Review all evidence and decide on an outcome
- If no risk of harm is found, consider additional training or monitoring for the staff member
- If new information raises serious risk or meets the harm threshold, refer the matter to the LADO

15.10.5 Loreto College, St Albans fosters a safeguarding culture where every staff member is professionally curious. We:

- Clarify expected staff behaviour and help them distinguish it from concerning conduct
- Encourage prompt reporting of Low-Level Concerns
- Address unprofessional behaviour early and support corrective measures
- Handle concerns sensitively and in proportion to their nature
- Use reported concerns to identify and address any weaknesses in our safeguarding systems

15.11 Record keeping for Concerns and Allegations

15.11.1 It is vital that our stakeholders know how to share information about concerns for professionals and volunteers working with children. To ensure safe working practice:

- All staff and volunteers must record the details of the Low-Level Concerns and submit them to the Headteacher/Principal
- Records are confidential, stored securely, and comply with the Data Protection Act 2018 and UK GDPR
- If a pattern of inappropriate behaviour emerges, the Case Manager will decide on disciplinary action, or if the Harm Threshold is reached, refer to the LADO (per KCSiE Part Four, Section One)
- We will review and revise relevant policies or training to address any school-culture factors that enabled the behaviour
- Records of concerns are retained by Loreto College, St Albans until the individual reaches retirement-age or for the next ten years, whichever period is longer

15.12 Managing Allegations (those that DO MEET the Harm Threshold for LADO)

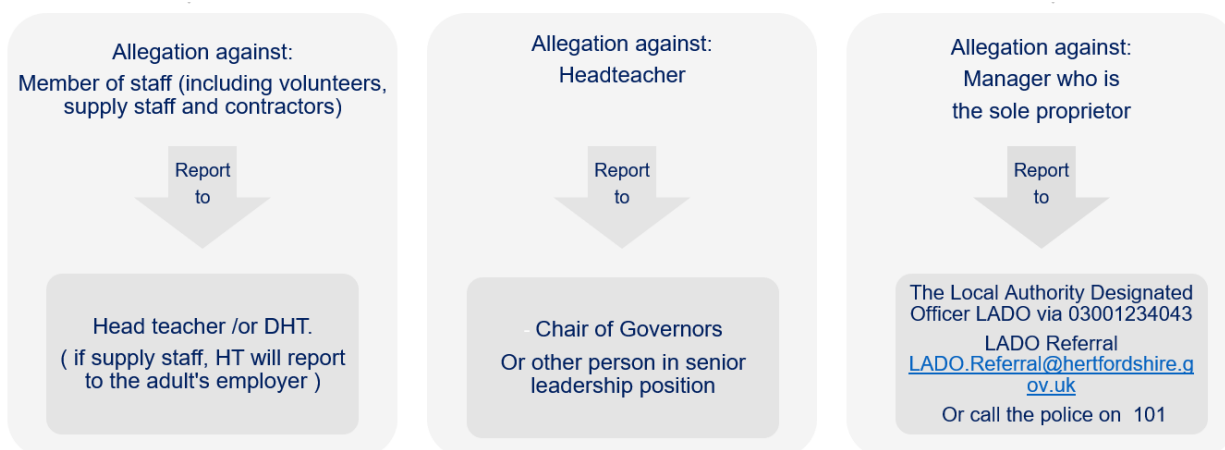
15.12.1 When concerns/allegations meet the harm threshold Loreto College, St Albans is required to comply with both Part Four of KCSiE and Hertfordshire Safeguarding Children Partnership Procedures Manual [Section 5.1.5 Managing Allegations Against Adults Who Work With Children and Young People](#).

15.12.2 All staff and volunteers at Loreto College, St Albans are required to immediately report any level of concerns about behaviour and/or conduct of an adult working/volunteering with children towards a child to leadership and management. This includes reporting adults who are providing out of school activities/leasing Loreto College, St Albans facilities.

15.12.3 These are Loreto College, St Albans procedures for managing cases of concerns/allegations that meet the Harm Threshold and may indicate a person is a risk of harm to children if they continue to work in their present position, or in any capacity with children and young people.

This is the process and the threshold criteria we apply if it is alleged that anyone working in our school or a college, including supply teachers, volunteers and contractors has:

<i>Behaved in a way that has, or may have harmed a child/young person</i>	<i>Possibly committed a criminal offence against/related to a child/young person</i>	<i>Behaved toward a child/young person in a way that indicates he or she would pose a risk of harm</i>	<i>Behaved or may have behaved in a way that indicates they may not be suitable to work with children/young people</i>
Harm Threshold	Criminal Threshold	Suitability Threshold	Transferable Risk Threshold
<u>Examples:</u> Sexual abuse, including grooming, both directly or online Physical abuse Emotional abuse Neglect Exploitation Any form of abuse and neglect that has caused a child significant harm (as defined in the Children Act 1989)	<u>Examples:</u> Adult has been arrested / reported for downloading indecent images of a child Any sexual act that meets a criminal threshold	<u>Examples:</u> Adult has been the subject of criminal procedures Caused harm or possible harm to a child or adult at risk Failed to understand or comply with the need for clear personal and professional boundaries in the workplace Conduct concerns or breach of policies that are more serious than Low-Level Concerns e.g. persistent, concerning behaviour	<u>Examples:</u> Concerns about the adult's 'reckless' behaviour and conduct in their personal and private life that could bring the school into disrepute Criminal misuse of substances, alcohol, drugs Criminal acts of dishonesty or violence against another person Sexual violence and harassment towards another adult or child Internet crime



If you consider that your concerns / allegation has not been taken seriously, call NSPCC Whistleblowing advice line 0800 028 0285

15.13 Role of the Local Authority Designated Officer

15.13.1 The LADO does not have a public facing role. They do not, for example, liaise directly with children and their families, nor do they directly investigate allegations. Their role is as follows:

- **Case management** - oversee the process and ensure it is working, not to investigate.
- **Consultation** - provide advice and guidance to employers and voluntary organisations.
- **Monitoring** - the progress of cases to ensure that they are dealt with as quickly as possible consistent with a thorough and fair process.
- **Liaison** -with the Police, Children's Services and other partner agencies (managers of the subject of allegation).

15.14 **Role of school's Case Manager for Allegations:**

15.14.1 This will be a staff member in a senior role e.g. Headteacher or Chair of Governors/Trust, if the concerns are about our schools Headteacher, their remit is to:

- clarify facts of the concerns/allegation (not investigate) before contacting the LADO
- take part in Strategy Meetings to liaise with other partner agencies
- undertake internal planned inquiries/fact finding
- take part to review the progress of the case in which there is a Police officer investigation
- operate a thorough disciplinary process when appropriate
- ensure a properly managed conclusion and outcome to process.

15.15 **LADO Principles and Response**

15.15.1 **Timeliness** - any allegation of abuse must be dealt with fairly, quickly and consistently in accordance with the safeguarding and child protection procedures, this is best practice to provide immediate safety for child/ren , and make safe arrangements for the person who is the subject of the allegation. It is crucial that employers **make a referral to LADO within one working day**.

15.15.2 **Objectivity** - it is not permissible for a member of staff to conduct (though their involvement may still be required) an enquiry about suspicion or allegation of abuse with respect to a:

- relative
- friend
- colleague, supervisor/supervisee or someone who has worked with her/him previously in any of these capacities.

If, following the conclusion of child protection processes, further enquiries are pursued for the purpose of disciplinary, regulatory or complaint investigation, they should be arranged in a way that avoids the repeated interviewing of children or other vulnerable witnesses.

15.15.3 **Confidentiality** - information about an allegation must be restricted to those who have a need to know in order to:

- protect children
- facilitate enquiries
- avoid victimisation
- safeguard the rights of the person about whom the allegation has been made and others who might be affected
- manage disciplinary/complaints aspects.
- A media strategy should be developed with no improper or inadvertent releases of information to the media, in accordance with the Association of Chief Police Officers (ACPO) guidance (now known as [The National Police Chiefs' Council \(NPCC\)](#))

15.15.4 **Support** - parents/carers of a child(ren) involved should be:

- informed of the allegation as soon as possible, provided provision of information and advice at that stage does not impede the enquiry, disciplinary or investigative processes, and may need to be told immediately, e.g. a child requires medical treatment
- helped to understand the process involved and kept informed about the progress of the case
- told that there has been an enquiry or disciplinary process (but no detail is to be provided in relation to any internal HR processes)
- when necessary, helped to understand the outcomes reached (but see above proviso in relation to the provision of advice)
- the employer should keep the subject of the allegation informed of progress in the case and arrange to provide appropriate support (via Occupational Health or equivalent). If the person is suspended, (s)he should be kept informed of development in the workplace and if a member of a Trades Union or professional association.

15.15.5 **Monitoring** - the LADO should monitor the progress of cases either fortnightly or monthly depending on its complexity either via review Strategy Discussions or by liaising with Police and/or Children's Services colleagues, or employer as appropriate. The Designated Officer should keep records to ensure that every case is dealt with without undue delay.

15.15.6 If the Strategy Discussion/initial evaluation have decided that a Police investigation is required, the Police Joint Child Protection Investigation Team (JCPIT) should also set a target date for reviewing the progress of its investigation and consulting the Crown Prosecution Service (CPS) to consider whether to charge the individual/continue to investigate/close the investigation. Whenever possible that review should take place within four weeks of the decision to initiate a criminal investigation.

15.15.7 If the investigation is to continue, dates for subsequent reviews, ideally at fortnightly (at most monthly) intervals, should be set at the meeting.

15.15.8 **Target Timescales** - it is in everyone's interest for cases to be dealt with as quickly as possible, consistent with a fair and thorough investigation. Timescales (which are not performance indicators) will depend on nature, seriousness, and complexity of allegation(s) though in general (based upon data about allegations against education staff):

- 80% of cases should be resolved within one month
- 90% within three months.

All but the most exceptional should be completed within twelve months (it is unlikely cases requiring a criminal prosecution or complex Police investigation can be completed in less than three months).

15.16 **Reporting Concerns and Allegations**

Concern/Allegation about	Report to
Member of staff (including volunteers, supply staff and contractors)	Headteacher, Principal or Proprietor (or other with leadership status) If the allegation is against supply staff or contractor, leadership, management will pass on report to the adult's employer at their agency/company.
Headteacher, Principal or Proprietor	Chair of Governors / Vice Chair of Governors / Trustee board

	Your school website or Child Protection policy will have details of your Chair/Vice Chair of Governors.
Chair of Governors / Vice Chair of Governors / Trustee board Or Manager who is the sole proprietor	Local Authority Designated Officer LADO (for staff only) LADO.Referral@hertfordshire.gov.uk and/or Report to the police on 101 or if urgent 999
If you are worried that the concerns raised have not been taken seriously or escalated.	Chair of Governors Police 101 Children Services 0300 123 4043 NSPCC Whistleblowing Helpline 0800 028 0285 NSPCC Whistleblowing Email help@nspcc.org.uk
Concerns/Allegations relating to an incident that happened when an individual or organisation has used school premises for running activities for children e.g. community groups, sports and faith associations, or service providers that run extra-curricular activities)	Headteacher, Principal or Proprietor As with any safeguarding allegation, DSL will follow their schools safeguarding policies and procedures, including informing the LADO. Out-of-school settings: safeguarding guidance for providers - GOV.UK

- 15.16.1 **Concern about the Quality of Care/Practice:** If a stakeholder is concerned about a matter that is not of a child protection nature, but general queries about the perceived quality and standard of certain practice in our school and it is considered that something is not good enough or/suitable for its purpose. Please speak to Headteacher/Principal/DSL or our Chair of Governors/Trustees.
- 15.16.2 **Complaints:** if a stakeholder is unsatisfied with any aspects of how we implement and comply with safeguarding policies and procedures, to keep children and young people safe in our school.
- 15.16.3 Please refer to our *Complaints Procedures* which will advise as part of the stages, to share any initial queries and concerns with our schools Headteacher/Principal/DSL or our Chair of Governors/Trustees. Your feedback is important to us, and we would like to ensure to have an opportunity to reassure our stakeholders that any expression of dissatisfaction however made, about actions taken or a lack of action' is a priority to understand so that we can find a solution and support a complainant.
- 15.16.4 Our Complaints Procedures can be found on our school website.
- 15.17 **After-school clubs, community activities and tuition: safeguarding guidance for providers**
- 15.17.1 Loreto College, St Albans have a legal duty of care to ensure we maintain a safe environment for children. If we receive an allegation or concern relating to an incident that has happened when an outside individual or organisation are using our school premises, we will ensure that we follow our school's safeguarding and child protection procedures, which includes reporting allegations to the LADO, Children's Social Care and Police if a crime has been committed.
- 15.17.2 It is the role of Loreto College, St Albans governing body to ensure any organisation that hires the school premises is compliant with the guidance set out in [After-school clubs, community activities and tuition: safeguarding guidance for providers – GOV.UK](#) (www.gov.uk) In particular we have embedded within our lease agreement with external

organisations the standards and expectations for them to provide evidence and assurance of their [safeguarding and child protection procedures](#).

15.18 Other complaints

15.18.1 If any of our stakeholders are not satisfied with any aspects of how we implement and comply with safeguarding policies and procedures, our school Complaints Procedures can be found on our school website.

15.19 Whistleblowing

15.19.1 At Loreto College, St Albans we strive to create a culture of openness, trust and transparency to encourage all staff to confidentially share any concerns they have about poor or unsafe practice, concerns or allegations against staff or the school's safeguarding practice and arrangements so they can be addressed appropriately.

15.19.2 All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's or college's safeguarding procedures and arrangements.

15.19.3 Examples where Whistleblowing may apply:

- pupil's or staff member's health and safety are being put in danger
- failure to comply with a legal obligation or statutory requirement
- attempts to cover up the above, or any other wrongdoing that is in the public/school interest
- do not delay! Your concerns should be taken seriously and investigated, and your confidentiality respected
- you should report your concern to the Headteacher/other member of staff on the SLT, and if concerns are about the Headteacher, report to the Chair of the Governing Board.

15.19.4 If, for any reason, there are difficulties with following the above procedure, you can whistle blow directly to Children's Social Care on 0300 123 4043 and/or the Police on 999, or to the NSPCC Whistleblowing Helpline 0800 028 0285 help@nspcc.org.uk

16. SAFER RECRUITMENT AND SAFER WORKING PRACTICE

16.1 At Loreto College we are committed to ensuring that safeguarding and promoting the welfare of children is embedded throughout the recruitment and selection process. The school will maintain a culture of vigilance and follow the requirements set out in Keeping Children Safe in Education (KCSIE) 2026 and all relevant safeguarding legislation.

16.2 The school will ensure that:

- Appropriate safeguarding and child protection checks are undertaken on all staff, governors, agency workers, contractors and volunteers before they commence work.
- At least one member of every recruitment panel has completed appropriate safer recruitment training.
- Applicants are required to explain any gaps in employment history and provide satisfactory references.
- Online searches are carried out as part of the shortlisting process to identify any incidents or issues that may be relevant to an applicant's suitability to work with children.
- All required pre-employment checks are completed and recorded on the Single Central Record (SCR).
- Any concerns arising during the recruitment process are explored and risk assessed before an appointment is confirmed.

16.3 Volunteer Roles and Safeguarding Arrangements

- 16.3.1 At Loreto College, we greatly value the time, commitment and support that our volunteers provide to our pupils and wider school community. Volunteers make a significant contribution to children's learning, wellbeing and development, and we are committed to ensuring that all volunteers feel welcomed, supported and respected.
- 16.3.2 From **1 September 2026** Crime and Policing Act 2026 legislation means that some volunteer roles that were previously able to operate under supervision arrangements may now fall within the definition of **regulated activity**. As a result, the school is required to review all current and planned volunteer roles to determine whether additional safeguarding checks are needed. This review will include, but is not limited to:
- Reading and classroom volunteers;
 - Volunteers supporting educational visits and enrichment activities;
 - Sports coaches and extracurricular club volunteers;
 - Volunteer mentors;
 - Parents and carers who regularly support school activities; and
 - Other volunteers who work regularly with children.
 - Classroom helpers;
 - Individuals provide regular supervision or care of pupils.
- 16.3.3 Where additional checks are required, (an Enhanced DBS check with Children's Barred List information) the school will provide clear information and support throughout the process. We are grateful for the valuable contribution our volunteers make and remain committed to ensuring that volunteering within our school continues to be a positive and rewarding experience for all involved.
- 16.3.4 We recognise that upcoming changes to safeguarding legislation may have implications for some volunteer roles. We want to reassure our volunteers that we will work openly and sensitively with individuals throughout this process, respecting their privacy, dignity and personal decisions. School leaders are available to discuss any questions, concerns or support needs that may arise.

NB some schools may have already completed this review during the summer term to ensure compliance arrangements are in place for the start of the autumn term, if you are a setting that has carried this out, please add in here to the effect what you have already done to meet this statutory requirement.

16.4 Ongoing Vigilance

- 16.4.1 We understand the importance of ensuring that Safer recruitment does not end at appointing a person into a post and in line with best safer working practice we maintain ongoing vigilance regarding the suitability of new positions alongside all staff and volunteers. At *Loreto College* we are following local HSCP procedures where we would respond appropriately to any safeguarding concerns, either if this is an allegation against an adult or a low-level concern (as set out in part 13).

16.5 Principles of Safer Working Practice

- 16.5.1 At Loreto College the school recognises that effective safeguarding is everyone's responsibility and that safeguarding and promoting the welfare of children underpins all aspects of school life. The school is committed to maintaining a strong safeguarding culture in which the welfare and best interests of the child are paramount in all decisions and actions.
- 16.5.2 The school will promote a whole-school safeguarding approach in which:

- Children are at the centre of all safeguarding practice and decision-making.
- All staff share responsibility for safeguarding and recognise that safeguarding is not solely the role of the Designated Safeguarding Lead (DSL).
- Safeguarding is embedded throughout the school's policies, procedures, curriculum, culture and daily practice.
- All staff receive appropriate safeguarding training, induction and ongoing support to enable them to identify concerns and respond effectively.
- Children are encouraged to share their views, wishes and feelings and know that they will be listened to and taken seriously.
- Staff maintain an attitude of "it could happen here" when considering safeguarding concerns and indicators of abuse, neglect or exploitation.
- Staff exercise professional curiosity, share concerns promptly and work collaboratively with safeguarding partners to secure the best outcomes for children.
- Safeguarding arrangements create an open, transparent and respectful culture where concerns about children or adults working with children can be raised without fear of reprisal.

16.6 **Safer Working Practice**

16.6.1 The school expects all adults working with children to maintain appropriate professional boundaries and to always act as positive role models.

16.6.2 All staff, trainee teachers, governors, volunteers, agency staff, contractors and visitors working with children are expected to comply with:

- The Staff Code of Conduct.
- The school's safeguarding and child protection procedures.
- Relevant professional standards.
- The Guidance for Safer Working Practice for Adults who Work with Children and Young People published by the Safer Recruitment Consortium.

16.7 **Creating and Maintaining a Safe Culture for children and staff**

16.7.1 *At Loreto College* we are committed to creating a safeguarding culture where:

- Children feel safe, valued and respected.
- Staff understand their safeguarding responsibilities.
- Concerns are identified and acted upon early.
- Poor practice, low-level concerns and allegations are addressed promptly and proportionately.
- There is a clear commitment to equality, inclusion, diversity and the protection of vulnerable children.
- Safeguarding arrangements are regularly reviewed to ensure they remain effective and reflect local and national guidance.

17. **SAFEGUARDING RECORDS AND RECORDS KEEPING**

17.1 Loreto College will hold records confidentially, safely, securely and in line with our records retention schedule.

17.2 All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

17.3 Records will 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 (including rationale), and the outcome.

- 17.4 Concerns and referrals will be kept in a separate child protection file for each child (either paper recorded or electronically).
- 17.5 Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to know/access them.
- 17.6 Safeguarding records relating to an individual child will be retained for the student until they reach their 25th birthday or 31st birthday if there is an EHCP in place (Information Records Management Society 2022). eBook: Ultimate Guide to Electronic Records Management | Laserfiche.
- 17.7 Safeguarding records which contain information about allegations of sexual abuse were being retained for the Independent Inquiry into Child Sexual Abuse (IICSA). This has now concluded, and the Home Office sent a letter to schools advising that files no longer needed to be kept indefinitely. However, the recommendations from the inquiry have stated:

Recommendation 17: Access to records The UK government should direct the Information Commissioner's Office to introduce a code of practice on keeping and accessing records which relate to child sexual abuse. The code should require records about child sexual abuse and allegations of child sexual abuse to be kept for 75 years, with appropriate review periods.

The school will follow the Recommendation 17.

17.8 **Receiving in and transferring pupil records to other education provision**

- 17.8.1 If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their safeguarding information file is forwarded as soon as possible, securely, and separately from the main pupil file.
- 17.8.2 To allow the new school/college to have support in place when the child arrives, this should be within:
- **5 days** for an in-year transfer, or
 - **the first 5 days** of the start of a new term.
- 17.8.3 In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the wellbeing and safety of the child.

17.9 **Retention, archiving and destruction of records**

- 17.9.1 For records that are not transferred to another school, for example the child leaves the country or is going to be home educated, we have:
- a clear retention policy
 - secure and appropriate system to archive with restricted access
 - we have a written assurance from our providers of our electronic recording systems that all records are maintained securely which includes any archived records.

- 17.9.2 Storage, retention, and destruction of our child protection files is also made clear in our data management policy.

18. **SAFEGUARDING QUALITY ASSURANCE, MONITORING AND GOVERNANCE**

- 18.1 At Loreto College, safeguarding is central to our vision, values and culture. We are committed to maintaining effective safeguarding arrangements and continually improving our practice to ensure that children, young people and staff feel safe, supported and able to thrive.

- 18.2 The Governing Body/Trust Board recognises its statutory responsibility for safeguarding and promoting the welfare of children and is committed to ensuring that safeguarding arrangements are effective, child-centred and compliant with current legislation and statutory guidance.

18.3 **Governance Responsibilities**

- 18.3.1 The Governing Body will:

- Ensure appropriate safeguarding and child protection policies, procedures and training are in place and implemented effectively.
- Monitor compliance with statutory safeguarding responsibilities, including those set out in *Keeping Children Safe in Education (KCSIE)*.
- Appoint an appropriately trained safeguarding governor/trustee to provide strategic oversight, support and challenge.
- Receive regular safeguarding reports from the Headteacher and Designated Safeguarding Lead (DSL), whilst maintaining appropriate confidentiality.
- Seek assurance that safeguarding concerns are identified, reported and responded to appropriately and in a timely manner.
- Ensure that online safety, filtering and monitoring arrangements are regularly reviewed and remain effective.
- Ensure sufficient resources, staffing and training are available to enable safeguarding responsibilities to be discharged effectively.

18.4 **Monitoring and Quality Assurance**

- 18.4.1 The effectiveness of safeguarding arrangements will be monitored through a programme of ongoing review, quality assurance and scrutiny. This will include:

- Regular safeguarding audits and self-evaluation activities.
- Review of safeguarding records, referral processes and decision-making.
- Monitoring of safeguarding training compliance and workforce development.
- Analysis of safeguarding, attendance, behaviour, exclusion and wellbeing data to identify emerging risks, trends and areas for development.
- Review of safeguarding incidents and learning from outcomes.
- Monitoring compliance with safer recruitment procedures.
- Evaluation of filtering, monitoring and wider online safety arrangements.
- Feedback from pupils, staff, parents/carers and other stakeholders, where appropriate.
- Safeguarding visits, reports and challenge from governors/trustees.

- 18.4.2 Audit activity enables leaders and governors to evaluate the effectiveness of safeguarding practice, identify strengths and areas for development, and provide assurance that statutory duties are being met. Where areas for improvement are identified, action plans will be implemented, monitored and reviewed to secure continuous improvement.

- 18.4.3 The school may also seek external review, support, challenge or scrutiny from safeguarding professionals, advisers or partner agencies to further strengthen safeguarding practice.
- 18.5 **Policy Review**
- 18.5.1 This policy will be reviewed annually by Mrs Ransom, Deputy Headteacher/DSL and it will be approved by the Governing Body.
- 18.5.2 The policy will also be reviewed and updated as required in response to:
- Changes in legislation, statutory guidance or local safeguarding arrangements.
 - Findings from safeguarding audits or reviews.
 - Emerging safeguarding risks or themes.
 - Learning arising from safeguarding incidents, allegations or practice reviews.
- 18.5.3 The Headteacher and Designated Safeguarding Lead are responsible for ensuring that staff are informed of any changes to safeguarding procedures and practice throughout the academic year.
- 18.5.4 This policy should be read alongside the school's associated safeguarding policies and procedures. A full list of related policies can be found in **Appendix 1**.
- 18.5.5 The Designated Safeguarding Lead and Headteacher are responsible for ensuring that staff are informed of any updates to safeguarding procedures and practice throughout the academic year.

APPENDIX 1: DECLARATION FOR STAFF
Child Protection Policy and Keeping Children Safe in Education (DfE 2026)

School/College name ...**Loreto College** Academic Year**2026/27**

Please sign and return to ...**Mrs Williams, Main School Office**

I, _____ have read and am familiar with the contents of the following documents and understand my role and responsibilities as set out in these document(s):

- (1) The School/College's Safeguarding (Child Protection) Policy
- (2) **Part 1** of '**Keeping Children Safe in Education**' DfE Guidance, 2026
- (3) **Annex A and Annex B** of '**Keeping Children Safe in Education**' DfE Guidance, 2026
- (4) Female Genital Mutilation (FGM) - The Facts

I am aware that the DSLs are:

Mrs Carol Ransom
Mrs Debbie Brown (Deputy)
Mrs Janet Caulfield (Deputy)
Mr Paul Downes (Deputy)

and that I able to discuss any concerns that I may have with them.

I know that further guidance, together with a copy of the Safeguarding Policy, is available on the school website and within the staff shared area.

Signed _____ Date _____

APPENDIX 2: DECLARATION FOR GOVERNORS
Child Protection Policy and Keeping Children Safe in Education (DfE 2026)

School/College name ...**Loreto College** Academic Year**2026/27**

Please sign and return to ...**Mrs Williams, Main School Office**

I, _____ have read and am familiar with the contents of the following documents and understand my strategic leadership role and responsibilities to work with the Full Governing Body to ensure that all staff and volunteers comply with such guidance and safeguarding arrangements at all times.

- (1) The School/College's Safeguarding (Child Protection) Policy
- (2) **Part 1** of '**Keeping Children Safe in Education**' DfE Guidance, 2026
- (3) **Annex A** of '**Keeping Children Safe in Education**' DfE Guidance, 2026
- (4) Female Genital Mutilation (FGM) - The Facts

I am aware that the DSLs are:

Mrs Carol Ransom
Mrs Debbie Brown (Deputy)
Mrs Janet Caulfield (Deputy)
Mr Paul Downes (Deputy)

and that I able to discuss any concerns that I may have with them.

I know that further guidance, together with a copy of the Safeguarding Policy, is available on the school website and within the staff shared area.

Signed _____ Date _____

APPENDIX 3: ABUSE, NEGLECT AND EXPLOITATION

Indicators of Physical Abuse	Indicators of Emotional Abuse
Bruises: - Commonly on the head but also on the ear, neck or soft areas (abdomen, back and buttocks) - Defensive wounds commonly on the forearm, upper arm, back of the leg, hands or feet - Clusters of bruises on the upper arm, outside of the thigh or on the body - Bruises with dots of blood under the skin - A bruised scalp and swollen eyes from hair being pulled violently - Bruises in the shape of a hand or object - Bruises on non-mobile babies. Burns or scalds: - Can be from hot liquids, hot objects, flames, chemicals, or electricity - These may be on the hands, back, shoulders or buttocks. Scalds in particular may be on lower limbs, both arms and/or both legs - A clear edge to the burn or scald - Sometimes in the shape of an implement, for example, a circular cigarette burn - Multiple burns or scalds. Bite marks: - Usually oval or circular in shape - Visible wounds, indentations or bruising from individual teeth. Fractures or broken bones: - Fractures to the ribs or the leg bones in babies - Multiple fractures or breaks at different stages of healing - Risks and vulnerability factors - Physical abuse can happen in any family, but babies and children who have a disability are at a higher risk of suffering physical abuse (Jones et al, 2012). <i>This list is non-exhaustive and covers the more typical indicators.</i>	- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person - Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate - Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction - A child seeing or hearing the ill-treatment of another - Serious bullying (including cyberbullying) - Causing a child to feel frightened or in danger - Exploitation or corruption of children. - Lack confidence - Struggle to control strong emotions - Struggle to make or maintain relationships - Display behaviour that is inappropriate to their stage of development (for example not being able to play, developing language late or using language you may not expect of a child their age. Older children may: - Struggle to control strong emotions or have extreme outbursts - Seem isolated from their parents - Lack social skills or have few, if any, friends - Use language, act in a way or know about things that you wouldn't expect them to know for their age - Risk and vulnerability factors - Children from any background can be at risk of emotional abuse. But some are more vulnerable than others. <i>This list is non-exhaustive and covers the more typical indicators.</i>

Indicators of Sexual Abuse	Indicators of Neglect
Not all children will realise they are being sexually abused, particularly if they have been groomed, but there may be physical, behavioural and emotional signs that indicate a child has experienced sexual abuse. Physical indicators include: • Bruising • Bleeding • Discharge • Pain or soreness in the genital or anal area • Sexually transmitted infections (Lindon and Webb, 2016) • Girls who are being sexually abused may become pregnant at a young age. Emotional and behavioural indicators include: • Being afraid of and/or avoiding a particular person (including a family member or friend) • Having nightmares or bed-wetting • Being withdrawn • Alluding to 'secrets' • Self-harming • Running away from home • Developing eating problems • Displaying sexualised behaviour or having sexual knowledge that is inappropriate for their stage of development • Misusing drugs or alcohol. <i>This list is non-exhaustive and covers the more typical indicators</i>	Neglect can be difficult to spot. Having one of the signs doesn't necessarily mean a child is being neglected. But if you notice multiple signs that last for a while, they might show there is a serious problem. Children and young people who are neglected might have: • Poor appearance and hygiene, being smelly or dirty (unkempt) • Being hungry or not given money for food • Having unwashed clothes, the wrong clothing, such as no warm clothes in winter • Health and development problems, regular illness or infections • Anaemia • Body issues, such as poor muscle tone or prominent joints • Medical or dental issues • Missed medical appointments, such as for vaccinations • Not given the correct medicines • Poor language or social skills. <i>This list is non-exhaustive and covers the more typical indicators</i>

Indicators of Child Criminal Exploitation CCE	Indicators of Child Sexual Exploitation CSE
• Having money or things they can't or won't explain • Being found or stranded in other locations • Committing petty crimes like shoplifting/vandalism • Exclusion/unexplained absences from school • Self-harm or significant changes in emotional well-being • Missing episodes • Being secretive about time online • Taking drugs and abusing alcohol • Being withdrawn or showing volatile behaviour • Carrying weapons • Relationships with controlling or significantly older individuals or groups • Unexplained injuries and refusing to seek medical help • Making more calls/texts, having multiple or new phones • Gang-association and/or isolation from peers/social networks. <i>This list is non-exhaustive and covers the more typical indicators</i>	• Self-harm • Being secretive • Sharp changes in mood or character • Having money or things they can't or won't explain (ie: clothes/food/jewellery/drugs) • Having an older boyfriend or girlfriend • Associating with older people who don't appear to be parent/carer/family • Involved in criminal activities like selling drugs or shoplifting. • Looking dishevelled or tired • Physical signs of abuse • Seen out late when they should be at school. • Spending a lot of time in one area • Others speaking on their behalf • Alcohol/Drug use • Sexually transmitted infections • Pregnancy. <i>This list is non-exhaustive and covers the more typical indicators</i>

APPENDIX 4: SFE GUARDING ISSUES AND SPECIFIC FORMS OF ABUSE

The DSL and leadership team should ensure that there are safeguarding arrangements in place to recognise and respond to children in these circumstances. To achieve this effectively the DSL should:

Ensure that all staff understand that children and young people (CYP), in these circumstances, could be susceptible to risk and harm from these safeguarding issues and specific forms of abuse and know what to look out for and how to respond (report to DSL).

All staff must read Annex B as part of staff induction and ongoing updates and training.

Ensure that all staff at Loreto College, St Albans adopt whole school approach for example share the belief that 'it can happen here'.

Reassure and be clear to all staff, children, parents and carers what arrangements you have in place to safeguard CYP if affected by these specific forms of harm.

Consider how school's curriculum teaches CYP to keep themselves safe from these specific harms both directly and online.

Safeguarding Issues, Child-on-child abuse	Safeguarding descriptor, links for further learning
Bullying	Including cyberbullying, prejudice-based and discriminatory bullying. Cyber Aware - NCSC.GOV.UK Helping Children Deal with Bullying & Cyberbullying NSPCC cyberbullying_teachers.pdf (proceduresonline.com) 5.1.13 Bullying (proceduresonline.com) Cyberbullying Guidance Childnet
Abuse in intimate personal relationships between children	Sometimes known as 'teenage relationship abuse'. Teenage Relationship Abuse The Children's Society (childrenssociety.org.uk) Expect Respect - Women's Aid (womensaid.org.uk) Controlling-Behaviour-in-Relationships-talking-to-young-people-about-healthy-relationships.pdf (womensaid.org.uk)
Physical abuse	Such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse) School strategies for preventing and tackling bullying No place for bullying Ofsted publication (publishing.service.gov.uk) How to talk to your children about bullying UNICEF 5.1.7 Children Who Abuse Others (proceduresonline.com)
Sexual violence	Such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence) sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse causing someone to

	engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party. Sexual violence and sexual Harassment KCSiE Harmful sexual behaviour (HSB) or peer-on-peer sexual abuse NSPCC Learning 5.3.10 Online Safety (proceduresonline.com) harmful-sexual-behaviour-pathway-2021.docx (live.com) brooks traffic light tool - Search (bing.com) harmful-sexual-behaviour-strategy-2021-23.docx (live.com) Review of sexual abuse in schools and colleges - GOV.UK (www.gov.uk) Overview Harmful sexual behaviour among children and young people Guidance NICE
Consensual and non-consensual sharing of nude and semi-nude images and/or videos	Also known as sexting or youth produced sexual imagery. Sharing nudes and semi-nudes: advice for education settings working with children and young people (publishing.service.gov.uk) Sharing nudes and semi-nudes: how to respond to an incident (overview) (updated March 2024) - GOV.UK (www.gov.uk) Sharing nudes and semi-nudes: how to respond to an incident (overview) (publishing.service.gov.uk)
Upskirting	This typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm. Upskirting: know your rights - GOV.UK (www.gov.uk)
Initiation/hazing type violence and rituals	This could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element. Who, what, why: Why is hazing so common? - BBC News
	Please note: CSE, CCE, domestic violence, mental FGM, forced marriage, serious violence are set out below.

Specific Forms of Abuse in Annex B of KCSiE, 2024	Safeguarding descriptor and links for further learning
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. Other community safety incidents in the vicinity of a school can raise concerns also, for example, people loitering nearby or unknown adults engaging children in conversation. Home - Action Against Abduction 5.3.6 Safeguarding Children from Abroad (including Children who are Victims of Trafficking and Unaccompanied Asylum Seeking Children) (proceduresonline.com)

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)	Both CSE and CCE are forms of abuse that occur where: • an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or • through violence or the threat of violence. CSE and CCE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. 5.3. 11 Children and young people affected by exploitation and serious violence (HSCP Procedures on line)
Child Criminal Exploitation (CCE)	CCE can include children being forced or manipulated into: • transporting drugs or money through county lines • working in cannabis factories, shoplifting, or pickpocketing • committing vehicle crime • threatening/committing serious violence to others • becoming trapped by exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt • coerced into carrying weapons such as knives/carry a knife for self-protection • children involved in CCE often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and not treated as victims despite the harm they have experienced • the experience of girls can be very different to that of boys and the indicators may not be the same, especially as they are at higher risk of CSE: girls are at risk of CCE too. Criminal exploitation of children and vulnerable adults: county lines - GOV.UK (www.gov.uk) Child exploitation disruption toolkit - GOV.UK (www.gov.uk) Child sexual and criminal exploitation - Hertfordshire Grid for Learning (thegrid.org.uk) Criminal exploitation and gangs NSPCC
Child Sexual Exploitation (CSE)	CSE is a form of child sexual abuse and may involve: • physical contact, assault by penetration (rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing • non-contact activities like involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet • can occur over time or be a one-off and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media • includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited as they believe they are in a genuine romantic relationship.

	CEOP Education (thinkuknow.co.uk) Child exploitation disruption toolkit - GOV.UK (www.gov.uk) 5.3.4 Hertfordshire's Strategy to Prevent Child Sexual Exploitation (proceduresonline.com)
County Lines	- County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line” - This activity can happen locally as well as across the UK - no specified distance of travel is required - Children are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims - Children can be targeted and recruited into county lines in a number of locations including any type of school (including special schools), further and higher educational institutions, pupil referral units, children’s homes and care homes - Children are also increasingly being targeted and recruited online using social media. See CCE resources above Criminal exploitation of children and vulnerable adults: county lines - GOV.UK (www.gov.uk)
Children and the Court System	- Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed - Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children - The Ministry of Justice has launched an online child arrangements information tool with clear and concise information: may be unusual for parents and carers. Get help with child arrangements - GOV.UK (justice.gov.uk) Our resources for professionals Cafcass
Children who are absent from education	All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include: - abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines - it may indicate mental health problems, risk of substance abuse - risk of travelling to conflict zones - risk of female genital mutilation, so-called ‘honour’ based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school’s or college’s unauthorised absence procedures and children missing education procedures.

	Children missing from education - Hertfordshire Grid for Learning (thegrid.org.uk)
Children missing from home (<i>NB this is not in Annex B but to illustrate the separate processes</i>)	Use school's CP procedures to escalate to Children's Services/Police . Operation Encompass for MISSING CYP is Hertfordshire's system for sharing information quickly with schools to safeguard children following the success of supporting children who have witnessed Domestic Abuse. 5.4 Children and young people who go missing form home / care
Children with family members in prison	Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders (NICCO) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children. NICCO (National Information Centre on Children Offences) 5.6.5 Children Visiting Prisons (proceduresonline.com)
Cybercrime	Cybercrime is 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) • '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. Meeting digital and technology standards in schools and colleges - Guidance - GOV.UK (www.gov.uk) Cyber Choices - National Crime Agency Test Your Internet Filter Verify that your Internet Filter is blocking illegal, harmful, and inappropriate content. when-to-call-the-police--guidance-for-schools-and-colleges.pdf (npcc.police.uk)

Domestic Abuse (DA)	• DA encompass a wide range of behaviours and may be a single incident or a pattern of incidents • Abuse can be psychological, physical, sexual, financial, or emotional • Children can be victims of DA abuse e.g. see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse) • DA can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. Domestic abuse: recognise the signs - GOV.UK (www.gov.uk) Helplines briefing: The impact of domestic abuse on children and young people from the voices of parents and carers (nspcc.org.uk) 5.1.9 Domestic Abuse (proceduresonline.com) 5.1.9 Domestic abuse (HSCP procedures on line)
Homelessness	Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include: • household debt • rent arrears • domestic abuse and anti-social behaviour • the family being asked to leave a property. This is also a safeguarding issue and DSL should seek advice from Children's Social Care where a child has been harmed or is at risk of harm. Homelessness - Citizens Advice Stats and facts Centrepoin Professional Resources - Shelter England
Mental Health (MH)	Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, attendance, and progress at school. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a MH problem. Education staff are well placed to observe children day-to-day and identify those whose behaviors that suggest they may be experiencing a MH problem or be at risk of developing one. Mental Health First Aid Kit Childline Introducing the Sandbox: New online mental health digital advice and guidance service for 10-25s - Hertfordshire Grid for Learning (thegrid.org.uk)
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 and servitude • forced criminality • the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk) Hertfordshire Modern Slavery Partnership - Hertfordshire Grid for Learning (thegrid.org.uk) Safeguarding Children from Abroad (including Children who are Victims of Trafficking and Unaccompanied Asylum Seeking)
The Prevent duty/ Preventing Radicalisation and Channel	Children may be susceptible to extremist ideology and radicalisation. • Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces • Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups • Terrorism is an action that endangers or causes serious violence to a person/people, causes serious damage to property, or seriously interferes or disrupts an electronic system. Channel is a voluntary, confidential support program which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. The Prevent duty should be seen as part of school's and college's wider safeguarding obligations. Prevent duty guidance - GOV.UK (www.gov.uk) Prevent in Education - Hertfordshire Grid for Learning (thegrid.org.uk) 5.3.9 Prevent Guidance (HSCP procedures) Channel and Prevent Multi-Agency Panel (PMAP) guidance - GOV.UK (www.gov.uk)
Sexual Violence and Sexual Harassment between children in schools and colleges	Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur: • online • through a group of children sexually assaulting • sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable. Keeping children safe in education - GOV.UK (www.gov.uk) [Title] (publishing.service.gov.uk) brooks traffic light tool - Search (bing.com)

Serious Violence	Indicators, which may signal children are at risk from, or are involved with, serious violent crime: • increased absence from school • change in friendships or relationships with older individuals or groups • significant decline in performance • signs of self-harm • significant change in wellbeing • signs of assault or unexplained injuries • unexplained gifts or new possessions. Anything which could also indicate they have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. Advice to schools and colleges on gangs and youth violence - GOV.UK (www.gov.uk) Hertfordshire Serious Violence Strategy & Delivery Plan
Female Genital Mutilation (FGM) <i>So-called 'honour' based abuse (includes both Female Genital Mutilation and Forced Marriage)</i>	FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Whilst all staff should speak to the DSL (or a deputy) any concerns about FGM, there is a specific legal duty on teachers they must report this to the Police. Multi-agency statutory guidance on female genital mutilation - GOV.UK (www.gov.uk) Child Abuse Linked to Faith or Belief – National FGM Centre Female genital mutilation, honor based violence and forced marriage - Hertfordshire Grid for Learning (thegrid.org.uk)
Forced Marriage	Forcing a person into a marriage is a crime in England. A forced marriage is: • one entered into without the full and free consent of one or both parties • where violence, threats or any other form of coercion is used to cause a person to enter into a marriage • threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. Apply for a forced marriage protection order: Overview - GOV.UK (www.gov.uk) Multi-agency practice guidelines: Handling cases of Forced Marriage (proceduresonline.com) Forced marriage Childline