CAMBRIAN

Nurturing Growth - Inspiring Minds

# Child Protection and Safeguarding

# The Elms Primary School

**Consistent with Keeping Children Safe in Education 2026 and Working together to Safeguard Children 2026.**

**If the Government reissues any guidance during the 2026/27 period, it is the responsibility of Cambrian Learning Trust to ensure ongoing compliance.**

This document applies to all academies and operations of Cambrian Learning Trust.

www.cambrianlearningtrust.org

| Document Control | | | |
|---|---|---|---|
| **Author** | Headteacher | **Approved By** | Trust Board |
| **Last Reviewed** | September 2026 | **Next Review** | September 2027 |
| **Review Cycle** | Annually | **Version** | 2026 - 2027 |

# Contents

1. Introduction ..... 4
2. Legislation and Statutory Guidance ..... 5
3. Roles and Responsibilities ..... 5
4. Supporting Children ..... 7
5. Early Years Safeguarding ..... 12
6. Safeguarding children with Special Educational Needs and Disabilities (SEND) 13
7. Dealing with a Concern and Record Keeping ..... 14
8. Managing Child-on-Child Abuse Sexual Harassment Violence including Harmful Sexual Behaviours (HSB) ..... 17
9. Supporting Children who are Questioning their Gender ..... 18
10. Online Safety and Filtering & Monitoring ..... 20
Filtering and Monitoring ..... 20
11. Concerns and allegations about staff (including supply staff, trainee teachers, volunteers and contractors) ..... 22
12. Information Sharing ..... 22
13. Multi-Agency Working ..... 23
14. Safer Recruitment ..... 24
15. Training ..... 25
16. Whistleblowing in a Safeguarding Context ..... 26
17. Site Security ..... 26
18. Quality Assurance ..... 27
19. Policy Review ..... 27
20. Links with Other Policies ..... 27

In this document:

'The Trust' refers to the Cambrian Learning Trust.

Parent refers to:

- Any person who has parental responsibility for a child
- Any person who has care of a child (i.e lives with and looks after the child/young person)

| Key Personnel | Name(s) | Contact details |
|---|---|---|
| Designated Safeguarding Lead (DSL) | Shelley McIntosh | office@tep.cambrianlt.org<br>01367 240232 |
| Deputy DSL(s) | Luisa Kilby Salt<br>Emma Aspel | office@tep.cambrianlt.org<br>01367 240232 |
| School's named 'Prevent' lead | Shelley McIntosh | office@tep.cambrianlt.org<br>01367 240232 |
| School's named Neglect lead | Shelley McIntosh | office@tep.cambrianlt.org<br>01367 240232 |
| Trust Safeguarding Lead | Olivia Hawkins | ohawkins@cambrianlt.org |
| Safeguarding Trustee | Chris Salt | |
| Nominated Safeguarding Governor | Sarah Nisbett | snisbett@gov.cambrianlt.org |
| Chair of Governors | Sarah Nisbett | snisbett@gov.cambrianlt.org |
| Local Authority Designated Officer (LADO) | Jo Lloyd<br>Sandra Barratt<br>Amie Pilcher | 01865 810603<br><br>Lado.safeguardingchildren@oxfordshire.gov.uk |
| Education Safeguarding Advisory Team (ESAT) | ESAT Team | 01865 810603<br>ESAT.safeguardingchildren@oxfordshire.gov.uk |
| Locality Community Support Service (LCSS) worker | Ana-Marie Crockford | 0345 241 2705<br>LCSS@oxfordshire.gov.uk |
| Multi Agency Safeguarding Hub (MASH) | | 0345 050 7666 |
| Out of hours Emergency Duty Team (EDT) | | 0800 833408 |
| Police | | 101 or in emergencies 999 |

The Elms Primary School recognises its responsibility for safeguarding and child protection. This policy must be read, understood and adhered to in conjunction with the requirements for individual roles as stipulated in Keeping Children Safe in Education 2026.

# 1. Introduction

1.1. It is essential that everybody working in a school or college understands their safeguarding responsibilities. Everyone who comes into contact with children and families has a role to play in ensuring children and young people are safe from abuse, neglect, exploitation and harm. The Elms Primary School is committed to safeguarding children and aims to create a culture of vigilance. All staff should ensure that any decisions made are in the best interests of the child.

1.2. The Elms Primary School recognises that safeguarding and promoting the welfare of children is everybody's responsibility. Our school adopts a child-centred approach and seeks to ensure that every decision made reflects the best interests of the child. Staff are expected to maintain professional curiosity, recognising that abuse, neglect, exploitation and harm rarely occur in isolation and that multiple vulnerabilities may present simultaneously.

1.3. Our children's welfare is our paramount concern. The Local Governing Committee and Headteacher will ensure that our school will safeguard and promote the welfare of children and work together with agencies to ensure that our school has adequate arrangements to identify, assess and support those children who are likely to suffer or are suffering abuse, harm or neglect.

1.4. Our safeguarding policy is in keeping with relevant national procedures and local safeguarding arrangements, more details can be found via the Oxfordshire Safeguarding Children's Partnership. What to do if you think a child is at risk of abuse or neglect - Oxfordshire Safeguarding Children Partnership

1.5. The Elms Primary School the importance of providing help and support as soon as concerns emerge and will work collaboratively with children, families, Family Help services, Children's Social Care and other agencies to ensure children receive the right help at the right time.

1.6. This policy applies to all members of staff in our school, including all permanent, temporary and support staff, Governors, volunteers, contractors and external service or activity providers.

1.7. In line with Working Together to Safeguard Children 2026, The Elms Primary School places the child at the centre of all safeguarding practice.

Safeguarding decisions are informed by a clear understanding of the child's lived experience, their wishes and feelings and the impact of harm on their day-to-day life. All staff are expected to exercise professional curiosity and judgement and to act promptly where concerns are identified.

1.8. We recognise attendance as a core safeguarding responsibility so The Elms Primary School approach is grounded in KCSIE 2026 and Working Together to Improve School Attendance 2026 alongside our Cambrian Learning Trust Attendance Policy and Strategy. Daily monitoring of attendance enables early identification of vulnerability, patterns of concern, and children who may be at risk of harm, neglect, exploitation or disengagement from education. All unexplained absences will be treated as potential safeguarding issues and followed up promptly with robust school procedures eg, first-day calling, weekly home visits, escalation routes and multi-agency information-sharing.

# 2. Legislation and Statutory Guidance

This policy is informed by, and has due regard to, the following statutory guidance and legislation:

- Keeping Children Safe in Education DfE, 2026
- Working Together to Safeguard Children DfE, 2026
- Children Act 1989 and Children Act 2004
- Education and Inspections Act 2006
- Education Act 2011
- Equality Act 2010
- Data Protection Act 2018 and UK GDPR
- Children and Social Work Act 2017
- Restrictive interventions, including use of reasonable force, in schools, 2026
- Working together to Improve School Attendance, 2026

This policy also reflects Oxfordshire Safeguarding Children Partnership (OSCP) local procedures and thresholds.

# 3. Roles and Responsibilities

The Elms Primary School is a member of the Cambrian Learning Trust ('the Trust'), and in law it is the Trust that is ultimately accountable for ensuring the safety and wellbeing of all children in Trust schools. However, each school in the Trust has delegated responsibility for its own children; therefore, it is the school staff,

supported by the Local Governing Committee (LGC), who perform the key safeguarding roles.

3.1. The school's Designated Safeguarding Lead (DSL) has overall designated responsibility for safeguarding and ensures there is always appropriate cover for this role. The DSL provides leadership for safeguarding within our school, including ensuring robust challenge, reflective discussion and professional oversight of safeguarding decisions, particularly where concerns are emerging, cumulative or complex. The Elms Primary School will ensure there are robust arrangements in place to provide safeguarding leadership when the DSL is unavailable. Deputy Designated Safeguarding Leads have appropriate access to safeguarding records and systems to enable them to carry out their role effectively. Our school ensures that secure arrangements are in place to facilitate the sharing of safeguarding information between members of the safeguarding team where necessary to protect children.

3.2. All staff members understand the importance of professional curiosity and challenge in safeguarding practice and are expected to act promptly where there are concerns about a child's safety or welfare.

3.3. All staff must understand that mental health problems can be signs of abuse, neglect or exploitation and staff must treat emerging mental health concerns as potential safeguarding issues rather than purely pastoral matters, working closely with DSL's and safeguarding teams to monitor and support concerns.

3.4. The Local Governing Committee (LGC) is collectively responsible for ensuring that safeguarding arrangements are fully embedded within the school's ethos and reflected in the school's day-to-day practice.

3.5. The Governing Committee will ensure safeguarding arrangements reflect emerging safeguarding risks including extra-familial harm, attendance related vulnerability, online harms, technology-enabled abuse, exploitation and serious violence.

3.6. The Elms Primary School and our Local Governing Committee (LGC) will ensure that appropriate filtering and monitoring systems are in place and are effective in reducing children's exposure to harmful online content and activity. These arrangements will be proportionate, age-appropriate, risk based and regularly reviewed. The Governing Committee will maintain strategic oversight of filtering and monitoring arrangements and will receive appropriate assurance regarding their effectiveness, at least once per academic year. Filtering and monitoring arrangements form part of our school's wider safeguarding framework and will be considered alongside staff training, curriculum provision, online safety education and risk assessment processes.

3.7. All staff, Governors, volunteers and external providers are expected to identify children who may benefit from additional support, including Family Help, and to raise concerns promptly with the Designated Safeguarding Lead.

3.8. The Elms Primary School acknowledges the need to treat everyone equally, with fairness, dignity and respect. Any discriminatory behaviours are challenged, and children are supported to understand how to treat others with respect.

# 4. Supporting Children

4.1. The Elms Primary School understands that safeguarding and promoting the welfare of children is defined by Working Together to Safeguard Children 2026 as:

- Providing help and support to meet the needs of children as soon as problems emerge.
- Protecting children from maltreatment, whether that is within or outside the home, including online.
- Preventing 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.
- 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 child.
- 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.

4.2. Categories of abuse are defined in Keeping Children Safe in Education 2026, and understood by our school as:

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

**Emotional abuse**: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse, such as persistent criticism, belittling, or name-calling, as well as not giving the child opportunities to express their views,

deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Sexual abuse**: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

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

4.3. Our staff are aware that safeguarding issues often overlap and can put children at risk of harm, including but not limited to, the categories of above. The following are understood as being potential indicators of risk:

- Drug taking and/or alcohol misuse
- Unexplainable and/or persistent absences from education
- Serious violence, criminal exploitation (including that linked to county lines), radicalisation
- Consensual and non-consensual making or sharing of nudes or semi nudes.

Additional information on these safeguarding issues and information on other safeguarding issues are included in Annex A of Keeping Children Safe in Education 2026.

4.4. The Elms Primary School **will support all children by**:

- Ensuring the curriculum contributes to safeguarding and promotes children's welfare through age-appropriate and developmentally appropriate teaching, including through PSHE, RSHE, Health Education, Computing and other relevant curriculum areas. This will include learning about healthy respectful relationships, consent, online safety, digital resilience, safeguarding, exploitation, discrimination, equality, diversity, misogyny, prejudice, mental health and wellbeing, harmful sexual behaviour, serious violence, radicalisation, the safe use of technology, including generative artificial intelligence, and how to seek help when concerned about themselves or others.
- Ensuring that safeguarding education is responsive to emerging local and national safeguarding risks and reflects the lived experiences of children.
- Ensuring that safeguarding education is responsive to emerging local and national safeguarding risks and reflects the lived experiences of children.
- Ensuring our school implements and applies mobile phone arrangements in accordance with Department for Education guidance and our school's own mobile phone, behaviour and online safety policies.
- Encouraging children to talk about feelings and ensuring they are listened to by a range of appropriate adults.
- Recognising that mental health concerns, self-harm, suicidal ideation, eating difficulties and significant emotional distress may be indicators that a child has experienced or may be at risk of abuse, neglect, exploitation or other safeguarding concerns.
- Ensuring that children know where and how to access support for their mental health and wellbeing within school and through external services where appropriate.
- Recognising that young carers may experience additional safeguarding vulnerabilities including emotional wellbeing concerns, reduced attendance, caring responsibilities and social isolation. Staff will be alert to these needs and will ensure that appropriate support is provided in partnership with families and other agencies.
- Ensuring that children's voices, wishes and lived experiences are central to decision-making and that their views are sought, recorded and taken seriously, in line with Working Together to Safeguard Children.

- Raising and working together with other support services and those agencies involved in safeguarding children, including Family Help and preventative services as required in Working Together to Safeguard Children 2026.
- Recognising that Family Help is a shared responsibility across agencies and that schools play a key role in identifying emerging need, cumulative harm and vulnerability at an early stage.
- Considering the role of family networks, kinship care and protective factors, alongside risks, when assessing need and planning support.
- Recognising that regular attendance is a protective factor and that persistent absence, severe absence, repeated lateness, missing education and disengagement from learning may indicate safeguarding concerns, vulnerability or unmet need.
- Considering intra familial harms and any necessary support for siblings.
- Having a behaviour policy that focuses on early support, prevention and de-escalation, particularly for vulnerable children. The policy should make clear that restrictive physical interventions are a last resort and are only used where necessary and proportionate. It also sets out our school's statutory duties to record and report all significant incidents involving the use of force, including timely recording, notifying parents, and reviewing incidents to reduce future risk, alongside clear measures to prevent bullying, including cyber-bullying, prejudice-based and discriminatory bullying.
- Having clear procedures in place for addressing and minimising the risk of child-on-child abuse, including harmful sexual behaviours, sexual violence, and sexual harassment (which could take place on or off-line).
- Recognising that children may experience harm beyond their family environment, including child criminal exploitation, child sexual exploitation, serious violence, county lines activity, harmful sexual behaviour, peer abuse and online abuse.
- Recognising that serious violence, weapon carrying, threats of violence, peer conflict and criminal exploitation may present significant safeguarding risks and ensuring concerns are identified and responded to appropriately.
- Alerting the Local Authority if our school is aware of any child being looked after under a Private Fostering arrangement. On admission to school, and at other times, our school will be vigilant in identifying any Private Fostering arrangement.
- Acknowledging that a child that is looked after (CWCF), in kinship care or has been previously looked after by the Local Authority potentially remains

vulnerable and ensuring that all staff have the skills, knowledge and understanding to support these children.

- Taking positive action, where it can be shown that it is proportionate, to deal with disadvantages affecting children or students with certain protected characteristics to meet their specific need. For example, taking positive action to support girls if there was evidence that they were being subjected to sexual violence or sexual harassment. This includes making reasonable adjustments for disabled children and young people and those identified as having special educational needs.
- Recognising that children who are lesbian, gay, bisexual, or gender-questioning may experience bullying, discrimination or vulnerability. Our school will consider each child's individual circumstances, listen to their views, work in partnership with parents wherever appropriate, take account of relevant professional advice and ensure safeguarding decisions are made in the child's best interests.
- Challenging sexist, misogynistic, discriminatory and abusive behaviours and promoting a culture of respect, equality and safety.
- Recognising that children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual making or sharing of nudes or semi-nudes, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.
- Recognising that children with medical needs or complex health needs may require additional safeguarding consideration. Staff will remain alert to indicators of abuse, neglect or exploitation and ensure that safeguarding and medical needs are considered together when assessing risk.
- Being aware that where a school places a child with an alternative provision provider, it continues to be responsible for the safeguarding of that child and should be satisfied that the placement meets the child's needs. Our school will follow DfE guidance on Alternative Educational Provision: Alternative provision - GOV.UK and our Cambrian Learning Trust Policy and Procedures.

### 4.5. Reasonable Force

The Elms Primary School may use reasonable force or restrictive physical intervention only as *a* last resort *to prevent immediate harm, in line with* Keeping Children Safe in Education *Keeping children safe in education 2026 (comes into force from 1 September 2026), DfE's Use of* Reasonable Force Guidance *Use of reasonable force and other restrictive interventions guidance* and our Cambrian Learning Trust Policy *Cambrian Learning Trust - Policies and Procedures*.

Any intervention must be proportionate**,** necessary and the least restrictive option available to keep children and staff safe. Staff are trained to use de-escalation first, act in a trauma-informed manner and ensure that pupils' dignity is protected throughout. All incidents are recorded promptly, reported to senior leaders and reviewed to ensure practice remains safe, lawful and centred on the child's wellbeing.

# 5. Early Years Safeguarding

Cambrian Learning Trust and The Elms Primary School ensures that safeguarding practice in the Early Years is fully aligned with the Early Years Foundation Stage (EYFS), KCSIE 2026 and Working Together 2026.

5.1. Staff working with our youngest children receive training and understand the importance of early identification, strong parental partnership, and swift access to Family Help where concerns arise.

5.2. Early Years provision requires continuous, appropriate supervision, including during toileting, intimate care, free-flow play and outdoor learning. Staff must follow safer working practice at all times, ensuring children are always within sight or hearing.

5.3. The expectation is on clear recording and monitoring of any emerging concerns, including behaviour changes, developmental worries, child-on-child incidents, or signs of distress.

5.4. All Early Years staff and volunteers must meet enhanced safer recruitment expectations. Volunteers may not work unsupervised, and all settings must have at least one paediatric first aider available on site and on trips.

5.5. Online safety teaching must be age-appropriate, with safe use of digital devices and strict controls on photographing or recording children.

5.6. The Elms Primary School recognises that harmful sexual behaviour can occur in very young children. Staff understand what is developmentally typical (supported by the Brook Traffic Light Tool), what may indicate concern and how to respond proportionately and in partnership with parents/carers.

5.7. As all Safeguarding practice, Early years safeguarding practice is reviewed regularly to ensure safe environments, consistent supervision and strong communications with families.

# 6. Safeguarding children with Special Educational Needs and Disabilities (SEND)

6.1. The Elms Primary School recognises that children with Special Educational Needs and Disabilities (SEND) can face additional safeguarding challenges. As a school, we are committed to ensuring that all children, regardless of their needs, feel safe, supported, and protected from harm.

## Key Principles:

- **Increased Vulnerability**: We recognise that children with SEND may be more vulnerable to abuse and neglect, including peer-on-peer abuse, and may experience barriers to disclosure and communication.
- **Individualised Support**: Safeguarding measures will be tailored to meet the specific needs of each child, as outlined in their Education, Health and Care Plan (EHCP) or other supporting paperwork.
- **Communication**: Staff are trained to understand and respond to a range of communication needs. This includes using appropriate strategies, alternative communication methods, and assistive technologies to help children express concerns.
- **Trusted Relationships**: Staff will foster strong, trusting relationships with children, enabling them to feel secure and confident to raise any concerns.
- **Partnership with Parents/Carers**: We aim to work closely with parents and carers of children with SEND to ensure a consistent and holistic approach to safeguarding.
- **Multi-agency Collaboration**: We will engage with relevant external agencies, including educational psychologists, social care, and health professionals, to support the safeguarding and welfare of children with SEND.
- **Staff Training**: Staff will receive regular safeguarding training with a specific focus on recognising and responding to the indicators of abuse in children with SEND.
- **Monitoring and Review**: The Designated Safeguarding Lead (DSL), in collaboration with the Special Educational Needs & Disabilities Coordinator (SENDCo), will monitor the effectiveness of safeguarding strategies and review them regularly to ensure that the needs of children with SEND are met.

By proactively identifying potential risks and addressing the unique challenges faced by children with SEND, The Elms Primary School aims to provide a safe and inclusive environment for all children.

# 7. Dealing with a Concern and Record Keeping

The Elms Primary School recognises any child may benefit from support via universal services, community based Early Help, targeted Family Help prior to statutory services.

7.1. Our staff are alert to the potential need for additional support for a child who:

- Is disabled or has certain health conditions and has specific additional needs.
- Has special educational needs (whether or not they have a statutory Education, Health and Care plan).
- Has a mental health need.
- Is a young carer.
- Is pregnant and/or is a parent themselves.
- Has exhibited early signs of abusive, violent and/or harmful behaviours.
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Is frequently missing/goes missing from education, home or care.
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Child Referral Unit.
- Is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation.
- Is at risk of being radicalised into terrorism.
- Has a parent or carer in custody or is affected by parental offending.
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- Is misusing alcohol and other drugs themselves.
- Is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage.
- Is a privately fostered child.

7.2. All staff are aware of the processes for supporting children and families including criteria, referral route and associated legislation including.

- Community-based Family Help assessments.
- Family Help support/Targeted early help (Section 10 and 11 of the Children Act 2004).
- Children in Need including how this applies for disabled children (Section 17 of the Children Act 1989).
- Child protection- when there is reasonable cause to suspect a child is suffering or likely to suffer significant harm (Section 47 of the Children Act 1989).
- Care and supervision orders (Section 31 of the Children Act 1989).
- Duty to accommodate a child (Section 20 of the Children Act 1989).

7.3. If a member of staff has a concern about a pupil or if a pupil tells them they are being, or at risk of being, abused, exploited or neglected, staff will appropriately respond by listening and offering reassurance. Staff will take account of the wishes and feelings of the child, will not make any promises and will keep the child informed (age appropriate) of the action that will be taken.

7.4. Staff should

- Listen to the wishes and feelings of the pupil, do not to make any promises but keep the pupil informed (age appropriate) of action that will be taken.
- Report it to the DSL/DDSL promptly (as soon as possible)

Make an accurate factual record as soon as possible detailing:

- A clear and comprehensive summary of the concern including the child's voice.
- Record of actions taken including consideration of any urgent medical attention
- Dates and times of their observations
- Dates and times of any discussions in which they were involved
- Any injuries
- Explanations given by the pupil / adult
- What action was taken
- Any actual words or phrases used by the pupil

- Any actual words or phrases used by the school staff including any questions the staff member asked

Staff should ensure that records distinguish between fact, observation, the child's wishes and feelings, information received from others and professional opinion. Where professional judgment has informed decision-making, the rationale for that judgment should be clearly recorded.

The Elms Primary School maintains a clear safeguarding separation between behaviour responses and safeguarding processes. When an incident occurs, staff will first consider whether any element of the situation indicates a safeguarding concern this could include vulnerability, harm, unmet need or risk. Staff will ensure this is escalated to the DSL through safeguarding channels, not behaviour pathways. Behaviour sanctions or consequences are applied only after safeguarding considerations have been addressed, ensuring that pupils' welfare, context and safety remain central. All safeguarding related information is recorded on CPOMS, overseen by the DSL and reviewed to ensure decisions are lawful, child-centred and compliant with KCSIE.

**The records must be signed and dated by the author (or equivalent on electronic based records).**

7.5. The Elms Primary School will discuss any concerns we have with the pupils' parents/carers . There may be occasions when this is not appropriate, and school staff would consult with other agencies prior to involving parents/carers . School will record any decision not to discuss with parents/ carers and why.

7.6. Following receipt of a safeguarding concern for a child, the DSL will:

- Consider if there is a requirement for any immediate action including MASH referral, Police report, medical intervention.
- Ensure that decisions taken, the rationale for those decisions, actions agreed and outcomes achieved are clearly recorded in writing. This includes situations where concerns are monitored, stepped down, or closed, and where referrals are not made.
- Records will demonstrate timely action, professional curiosity, reflective decision-making and how the child's wishes, feelings and lived experience have informed safeguarding assessment, decision making and planning.
- Records will provide a clear chronology of concerns and demonstrate how individual incidents have been considered within the context of any cumulative harm or emerging patterns of risk.

**Concern forms are kept via CPOMs, an electronic recording system, and in the staff room on the safeguarding board.**

7.7. In all Trust schools, as of September 2025, CPOMs is used to store safeguarding records. These safeguarding records kept for individual pupils are maintained separately from all other records relating to the pupil in the school. Safeguarding records are kept in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and in line with Data protection in schools - Record keeping and management - Guidance - GOV.UK.

7.8. Safeguarding records will be sufficiently detailed to support effective multi-agency working and enable professionals to understand the child's lived experience, identified risks, protective factors, actions taken, outcomes achieved and the rationale for safeguarding decisions.

7.9. All safeguarding records will be transferred securely and without unnecessary delay, in accordance with UK GDPR, data protection legislation, and Keeping Children Safe in Education, to the child's receiving school or setting within five school days. Where safeguarding concerns are significant or complex, the DSL will ensure a direct discussion takes place with the receiving DSL to support continuity of safeguarding arrangements. A record of the transfer will be retained.

7.10. The Headteacher will be kept informed of safeguarding concerns by the DSL, if they are not the DSL, and all other staff are informed on a need-to-know basis.

# 8. Managing Child-on-Child Abuse Sexual Harassment Violence including Harmful Sexual Behaviours (HSB)

8.1. All staff understand that child-on-child abuse includes a wide range of behaviours including sexual harassment, sexual violence, harmful sexual behaviour, misogynistic language, weapon-related threats and online abuse.

Such behaviour is never acceptable and should not be tolerated or dismissed as banter, part of growing up or normal behaviour.

8.2. Child-on-child abuse can occur between children of any age and sex and can take place both inside and outside of school, online and offline. It may be a one-off incident or a pattern of behaviour and should never be tolerated or dismissed.

8.3. The Elms Primary School understands that sexual violence and sexual harassment is not acceptable, and we are committed to creating a culture where children feel confident to report concerns, knowing they will be taken seriously.

8.4. Harmful sexual behaviours exist on a continuum and range from developmentally appropriate behaviour to problematic, abusive or violent behaviour. Responses are proportionate, child-centred and take account of the needs of both the victim and the alleged perpetrator, recognising that children displaying harmful behaviour may also be vulnerable.

8.5. When responding to concerns, The Elms Primary School will:

- Take all reports seriously, even where there is no physical evidence.
- Avoid victim-blaming and ensure children are supported appropriately.
- Consider the impact on the wider school environment.
- Involve external agencies where required.
- Record decisions, actions taken and rationale clearly.

8.6. All staff understand that even if there are no reports this does not mean abuse, harassment or violence is not happening, it is possible that abuse is unreported. Our staff challenge inappropriate behaviours between children that are abusive in nature.

8.7. The Elms Primary School follows Part 5 of Keeping Children Safe in Education when responding to all concerns related to child-on-child sexual violence, sexual harassment and harmful sexual behaviours and recognises the need for clear reporting routes, consistent responses and ongoing support for all children involved, including alleged perpetrators, in line with a trauma-informed approach.

# 9. Supporting Children who are Questioning their Gender

9.1. Our school recognises that some children may question their gender identity. In line with statutory guidance, we take a cautious, considered approach considering the best interests of the child and working in partnership with parents/carers.

The Elms Primary School will not initiate a social transition. Any requests for changes to name, pronouns, uniform, facilities or participation in activities will be considered case-by-case, with the DSL involved and advice sought from appropriate agencies where needed. Decisions will be guided by safeguarding

principles, child development and the impact on the wider school community. Trust and School policies will not reinforce harmful gender stereotypes.

9.2. The Elms Primary School provides single-sex toilets and changing facilities as required by law. Children will use facilities that correspond to their biological sex. Where appropriate, and where it supports a child's wellbeing, the school may offer privacy-enhancing alternatives (such as access to a separate staff toilet) without compromising safeguarding or statutory requirements.

9.3. On school trips, residentials and off-site activities, the school will ensure arrangements prioritise safety, supervision and appropriate sleeping/bathroom facilities. Sharing is not permitted between mixed biological sex. Alternative arrangements such as separate rooms will be considered, however schools retain discretion over whether or how this is provided. Decisions will be made individually on a case by case basis, ensuring robust safeguarding for all children.

9.4. For sports and physical activities, The Elms Primary School will follow national sporting guidance, which requires participation in sex-based categories for competitive sport to ensure fairness and safety. Where single-sex sport is required for safety, there are no exceptions. These arrangements are supported by exemptions within the Equality Act 2010.

Where a gender questioning child makes a request relating to participation, schools will consider inclusive alternatives where appropriate, particularly for non-competitive or curriculum-based activities, while ensuring safeguarding, supervision and risk management remain robust for all children

In situations where there are no safety concerns, schools will consider whether supporting social transition is in the child's best interests, taking into account the impact on other children and the need to maintain safe, fair and inclusive environments for PE and physical activity

These above principles apply across all age groups. However, the way The Elms Primary School implement inclusive alternatives or consider social transition will vary according to age, developmental stage, the nature of the activity and any associated safeguarding or safety considerations.

9.5. Staff will respond to any concerns sensitively and professionally, ensuring children feel listened to and supported. Designated Safeguarding Leads will oversee cases, maintain appropriate records and ensure decisions remain proportionate, lawful and in the best interests of the all.

# 10. Online Safety and Filtering & Monitoring

10.1. The Elms Primary School recognises that safeguarding children includes protecting them from harm arising through their use of technology and online services. The school takes a whole-school approach that protects and educates children and staff, supports safe and responsible use of technology, and ensures concerns are identified, reported, addressed and escalated.

10.2. Online safety is considered across our safeguarding practice, curriculum, staff training, parental engagement and the responsibilities of the Designated Safeguarding Lead (DSL). Detailed expectations for staff and pupil use of technology, personal devices and online communication are set out in the Staff Code of Conduct, IT Acceptable Use Policy and Mobile Phone Policy.

10.3. We consider online risk through the four areas identified in Keeping Children Safe in Education

- **content:** exposure to illegal, inappropriate, misleading or harmful material;
- **contact:** harmful interaction with other people or with digital systems, including generative artificial intelligence;
- **conduct:** online behaviour that causes harm or increases the likelihood of harm, including bullying, harmful image creation or sharing, and other forms of technology-enabled abuse;
- **commerce:** risks including inappropriate advertising, gambling, phishing, fraud and financial exploitation.

These categories are not exhaustive, and the school remains alert to new and emerging forms of online and technology-enabled harm.

10.4. We recognise that generative artificial intelligence presents both educational opportunities and safeguarding risks. Teacher-facing and pupil-facing AI must be used in line with Trust requirements, including applicable safeguarding, data-protection, acceptable-use and product-assurance arrangements. Staff and children receive age- and role-appropriate education and guidance on safe and responsible use, in line with Department for Education expectations.

## Filtering and Monitoring

10.5. The Trust and school maintain appropriate filtering and monitoring arrangements, in accordance with Keeping Children Safe in Education, the Department for Education filtering and monitoring standard, and the CLT Filtering & Monitoring Framework. We recognise that filtering and monitoring

systems are an important safeguarding measure but cannot prevent all online harm. Filtering and monitoring are safeguards within a wider approach that also includes supervision, staff vigilance, education and our established safeguarding procedures.

10.6. The appropriateness of filtering and monitoring arrangements will take account of the school's context, including the age and needs of children, children who may be at greater risk of harm, patterns of technology use, relevant devices and locations, and the school's Prevent risk assessment.

10.7. Roles and responsibilities for filtering and monitoring are covered by the CLT Filtering & Monitoring Framework, and the headteacher or head of school ensures that school-level roles are assigned appropriately.

10.8. Filtering and monitoring shall be reviewed at least once each academic year and following any significant change that may affect the effectiveness or coverage of the provision. The review shall use the resources in the CLT Filtering & Monitoring Framework and be supported by the DSL and IT services. Checks, findings, decisions and required actions will be recorded, escalated, and reviewed by LGCs and the trust safeguarding team.

10.9. The Designated Safeguarding Lead will understand the safeguarding capabilities and limitations of the school's filtering and monitoring arrangements and ensure that alerts and concerns are assessed and escalated through the safeguarding procedures set out in Section 7. IT support will maintain the technical controls, undertake agreed checks, support investigations and report identified weaknesses in accordance with the Cambrian Learning Trust Filtering and Monitoring Framework.

10.10. Staff will receive information appropriate to their role so that they understand the purpose and limitations of filtering and monitoring, their continuing responsibility for supervision and professional vigilance, and how to report harmful content, concerning activity, technical weaknesses or suspected attempts to bypass controls.

10.11. The Local Governing Committee seeks assurance that the school is implementing the Trust's filtering and monitoring requirements, that the required reviews have taken place, and that identified weaknesses are being addressed. Trust-level governance maintains strategic oversight of compliance, material risk and effectiveness across the Trust.

10.12. Additional guidance on filtering and monitoring is accessible through Meeting digital and technology standards in schools and colleges - Filtering and monitoring: core standard - Guidance - GOV.UK

# 11. Concerns and allegations about staff (including supply staff, trainee teachers, volunteers and contractors)

11.1. All staff understand the processes and procedures to manage any safeguarding concern or allegation (no matter how small) about staff members including supply staff, trainee teachers, volunteers and contractors).

11.2. If anyone has a concern or an allegation is made about a member of staff (including supply staff, trainee teachers, volunteers and contractors), this is referred to the Headteacher. If the concern relates to the Headteacher, this is referred to the Chair of Governors and CEO.

11.3. If there is a concern or an allegation about a member of staff (including supply staff, trainee teachers, volunteers or contractors) that does not meet the harm threshold; this should be reported in accordance with the low-level concerns policy.

11.4. The harm threshold as defined in Working Together to Safeguard Children 2026 details the requirement to refer any concern or allegation about anyone working with children (whether paid or voluntary) who may have:

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

Any concern or allegation that may meet the harm threshold must be referred to the Local Authority Designated Officer (LADO).

# 12. Information Sharing

12.1. The Elms Primary School recognise that all matters relating to Safeguarding are confidential.

12.2. All staff members have a professional responsibility to share information with other agencies to safeguard children.

12.3. All staff members who come into contact with children will be given appropriate training to understand the purpose of information sharing to safeguard and promote child welfare.

12.4. Information sharing decisions will be timely, necessary and proportionate, taking account of the nature and level of risk to the child. Staff will not allow concerns about confidentiality or data protection to impact safeguarding action where a child may be at risk of abuse, neglect, exploitation or harm.

12.5. Our staff will not assume that another professional will share information or take action to safeguard a child. Where staff remain concerned that appropriate action has not been taken, they will continue to escalate concerns through the DSL and, where necessary, in accordance with the OSCP Escalation and Resolving Professional Concerns and Disagreement Policy.

# 13. Multi-Agency Working

13.1. The Elms Primary School recognises safeguarding as a shared, multi-agency responsibility and contributes actively, respectfully and constructively to joint decision-making, information sharing and coordinated plans to support children and families.

13.2. The Elms Primary School will ensure that relevant staff members participate in multi-agency meetings and forums, including child protection conferences and core groups, to consider individual children.

13.3. Our DSL/DDSL (or member of the Safeguarding Team) will participate in Child Safeguarding Practice Reviews (CSPRs), other reviews and file audits as and when required to do so by the Oxfordshire Safeguarding Children's Partnership. The DSL will consult with relevant staff and ensure clear processes for gathering the evidence required for reviews and audits and will embed recommendations into practice and complete required actions within agreed timescales.

13.4. Where disagreements arise between professionals or agencies, these will be managed respectfully and escalated in line with local safeguarding partnership procedures under the OSCP Resolve Policy Escalation, resolving professional concerns and disagreements - Oxfordshire Safeguarding Children Partnership. Our school recognises the importance of constructive challenge to ensure that children receive the right help at the right time.

# 14. Safer Recruitment

***To be read in conjunction with the Safer Recruitment Policy***

14.1. The Elms Primary School recognises that safeguarding responsibilities do not end once recruitment checks have been completed. Safeguarding vigilance, professional conduct, supervision, training, low-level concern reporting, allegation management and ongoing suitability assessments form part of our school's safer cultures.

14.2. All staff understand the requirement to disclose to the Headteacher any concern that may affect their suitability to work with children.

14.3. The Governing Committee will seek assurance that safeguarding considerations are embedded throughout the employee lifecycle, including recruitment, induction, supervision, development and departure from employment.

14.4. The Elms Primary School is committed to ensuring the development of a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with children and staff.

14.5. The Elms Primary School maintains an accurate Single Central Record (SCR) in line with statutory guidance. This will be monitored and reviewed to ensure compliance by the Governing Committee through discussions with the Head, HR Director, Trust Safeguarding Lead or Head of Inclusion and our school's Leadership Team.

14.6. The Governing Committee will ensure that at least one person on every recruitment panel has completed safer recruitment training.

14.7. The Elms Primary School is committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2018 and related obligations under the Childcare Act 2006 in schools. (Applicable only to nursery, primary and childcare for children up to the age of 8)

14.8. The Elms Primary School will ensure that contractors and providers are aware of our school's safeguarding policy and procedures and that this will be referred to and followed if an allegation is made regarding a member of their agency. Our school will require that employees and volunteers provided by these organisations use our school's procedures to report concerns.

14.9. We will seek assurance that employees and volunteers provided by these organisations and working with our children have been subjected to the appropriate level of safeguarding checks in line with Keeping Children Safe in

Education 2026. If assurance is not obtained, permission to work with our children or use our school premises may be refused.

14.10. When we commission services from other organisations, we will ensure that compliance with our policies and procedures is a contractual requirement.

# 15. Training

15.1. All staff who work directly with children will read, understand and adhere to Part One, Part Five and Annex A of Keeping Children Safe in Education. Our school does not rely on condensed safeguarding summaries as a substitute.

15.2. All staff in our school receive appropriate safeguarding training at induction, which is updated at least annually. All staff are expected to be aware of the signs and symptoms of abuse and must be able to respond appropriately. Safeguarding training promotes a culture of vigilance, professional curiosity and confidence to act. Staff are supported to understand how safeguarding concerns may present cumulatively and across different areas of a child's life.

15.3. Our Designated Safeguarding Lead (DSL) undergoes training to provide them with the knowledge and skills required to carry out their role; this training is refreshed every 2 years.

15.4. Deputy Designated Safeguarding Leads (DDSL's) are trained to the same standard as the DSL and this training is refreshed every 2 years.

15.5. Safeguarding training is provided to all new staff on appointment as part of their induction process including our school's code of conduct, online safety which, amongst other things, includes an understanding of the expectations and applicable roles and responsibilities in relation to filtering and monitoring. This information will be regularly updated

15.6. Our school will maintain accurate and up to date records of staff induction and training. Training records will be reviewed during Trust Safeguarding Audits and monitored during visits from the Safeguarding Governor.

15.7. The Governing Committee will ensure that all Governors receive appropriate safeguarding and child protection (including online) training at induction. This training equips them with the knowledge to provide strategic challenge to assure themselves that the safeguarding arrangements are effective and support a whole school approach to safeguarding. The training should be regularly updated as per our CLT Training Schedule.

15.8. The Elms Primary School ensures that staff members provided by other agencies and third parties, e.g. supply teachers and contractors, have received appropriate safeguarding training commensurate with their roles.

15.9. The Trust Safeguarding Lead and school DSL updates school staff and volunteers on any changes to safeguarding legislation and procedures and relevant learning from Child Safeguarding Practice Reviews (CSPRs) in line with Working Together 2026. These updates will include learning from local and national CSPRs, with a focus on what this means for our schools safeguarding practice.

15.10. The Trust Safeguarding Lead and school DSL will use a variety of mechanisms to provide safeguarding updates to the school community including online safety.

# 16. Whistleblowing in a Safeguarding Context

Whilst there is a separate Whistleblowing Policy Cambrian Learning Trust - Policies and Procedures, this is a summary that outlines the process when there is a concern that safeguarding issues have not been reported or followed correctly.

This does not replace the whistleblowing policy and should be read in conjunction with this.

16.1. Whistleblowing is a term that is used when a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed. All staff and volunteers should feel able to raise concerns and know that they will be taken seriously by the Senior Leadership Team. If our staff identify a concern about poor or unsafe practice and potential failures in our school's safeguarding provision this should be reported to the Headteacher. If the concern is about the Headteacher, this should be reported to the Chair of Governors and/or Executive Headteacher contactable via the school website.

16.2. If staff are concerned with the action or inaction through internal reporting procedures, then staff should refer to the Whistleblowing policy and may contact the NSPCC whistleblowing line on 0800 028 0285 or email help@nspcc.org.uk

# 17. Site Security

17.1. All staff members have a responsibility to ensure our buildings and grounds are safe; this includes ensuring the safety of any visitors to our school.

17.2. The Elms Primary School will not accept the behaviour of any individual, parent or anyone else, that threatens school security or leads others, child or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to our school site.

17.3. The Elms Primary School recognises the risk of camera-enabled wearable devices including glasses and is alert to the privacy, safeguarding and data protection implications for our school community with procedural guidance detailed in acceptable use of IT, visitor arrangements and codes of conduct.

# 18. Quality Assurance

18.1. The Elms Primary School will ensure that systems are in place to monitor the effectiveness of safeguarding arrangements, including the quality of decision-making, record keeping, multi-agency working and the impact of actions taken to safeguard children.

18.2. Our school's senior leaders and the Governing Committee will ensure that action is taken to remedy any deficiencies and weaknesses identified in child protection arrangements without delay.

# 19. Policy Review

19.1. This policy and the procedures will be reviewed at least annually in line with KCSiE Guidance, Working together to Safeguard Children and in line with any other statutory updates. All other linked policies will be reviewed in line with their policy review cycle.

19.2. The Headteacher and/or Designated Safeguarding Lead will ensure that staff members, including volunteers and sessional workers are made aware of any amendments to policies and procedures.

19.3. Additional updates to the Child Protection & Safeguarding Policy and appendices will take place as required in line with National and or local Guidance/Trust updates.

# 20. Links with Other Policies

This policy should be read in conjunction with the following Cambrian Learning Trust (CLT) Policies and Procedures:

- AI Policy/Guidance
- Alternative Provision (TO BE WRITTEN)
- Allergens

- Anti-Bullying
- Attendance
- Equality, Diversity & Inclusion
- Inclusion
- Mental Health and Wellbeing (Children)
- Relational Behaviour (Including reasonable force and restrictive physical intervention)
- Safer Recruitment
- Supporting Students with Medical Conditions
- Suspensions and Permanent Exclusions
- Staff Allegations
- Whistleblowing