NEW HEIGHTS SCHOOL
Focus · Learn · Achieve

Child Protection Policy

Status	**Statutory**
Responsible Governors' Committee	**Full Governing Body**
Date last approved by GB	**November 2025**
Responsible Person	**Co-Headteachers**
To Review Date	**November 2026**
Last Amended Date	**November 2025**

School Details

Co-Headteachers:	Jenny Hughes (KS2 and KS3) Kevin Unsworth (KS4)
Designated Safeguarding Lead(s):	Jenny Hughes (KS2) Christine Plunkett (KS3) Jenny Smith (KS4)
Deputy Designated Safeguarding Lead(s):	Liz Heague (KS2) Alan Gibbons (KS3) Dawn Melia (KS4)
Designated Teacher for Looked-after Children:	Emma Fillingham(KS2) Jenny Hughes (KS3) Jenny Smith (KS4)
Link Governor for Safeguarding:	Chris Little
Chair of Governors:	Ian Andain
Policy Date:	November 2025
Policy Status:	Statutory
Policy Review Cycle:	Annual
Next Review Date:	November 2026

This policy provides guidance to all adults working within the school whether paid or voluntary or directly employed by the school or by a third party.

This policy should be read alongside Part 1 and Annex B of Keeping Children Safe in Education 2025, and in conjunction with Section 1 of the SIL Schools Safeguarding Handbook, which is made available to all staff and volunteers within our school.

1. Introduction

New Heights School and its governing body recognises its duty towards safeguarding and promoting the welfare of children as set out in Section 175 / 157 of the Education Act 2002 / Education (Independent School Standards) Regulations 2014. New Heights School is the Liverpool Local Authority Pupil Referral Unit catering for students in KS2, KS3 and KS4 provision.

New Heights School will prevent and respond to abuse, neglect and exploitation by ensuring that the ethos and atmosphere of the school is conducive to a safe environment. Pupils and parents/carers will feel supported and able to report safeguarding concerns to any member of staff or volunteer. Staff and volunteers will feel they are supported by colleagues and the senior management team, including the governing body, and are able to report and seek advice and guidance on any safeguarding concerns, including those regarding colleagues or themselves. We will protect children at risk of abuse, neglect or exploitation by having policies and procedures in place that reflect current legislation, guidance and best practice.

As part of our safeguarding ethos, we encourage children to respect the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs. We will ensure that partisan political views are not promoted in the teaching of any subject in the school and where political issues are brought to the attention of the pupils, reasonably practicable steps will be taken to offer a balanced presentation of opposing views to pupils. We will ensure that reasonable steps are taken to ensure visitors to the school do not share messages with the school community which are contrary to our school ethos and beliefs.

Safeguarding is everybody's responsibility and, as such, this policy applies to all staff and volunteers working in the school. An allegation, disclosure or suspicion of abuse, or an expression of concern about abuse, could be made to any member of staff, not just those with a teaching or welfare-related role. Similarly, any member of staff may observe or suspect an incident of abuse.

2. Child Protection Statement

New Heights School is committed to safeguarding children and promoting children's welfare and expects all staff, governors, volunteers and visitors to share this commitment and maintain a vigilant and safe environment. Everyone has a responsibility to act, without delay, to protect children by reporting anything that might suggest a child is being abused, neglected or exploited. It is our willingness to work safely and challenge inappropriate behaviours that underpins this commitment. The school seeks to work in partnership with families and other agencies to improve the outcomes for children who are vulnerable or in need.

'*Safeguarding and promoting the welfare of children is* ***everyone's*** *responsibility.* ***Everyone*** *who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child centred. This means that they should consider, at all times, what is in the* ***best interests*** *of the child*.' (DfE 2023)

3. Definitions

In order to support effective multi-agency working, the following definitions are taken from Working together to safeguard children 2023.

Child:
A child includes everyone under the age of 18. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change their status or entitlements to services or protection.

Child Protection:
Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Where a child is suffering significant harm, or is likely to do so, action should be taken to protect that child.

Safeguarding Children:
Action should be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or are at immediate risk.

"*Safeguarding and promoting the welfare of children is defined as providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, whether the risk of harm comes from within the child's family and/or outside (from the wider community), 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 children and taking action to enable all children to have the best outcomes set out in the* ***Children's Social Care National Framework***." (DfE 2023)

Effective safeguarding means practitioners should understand and be sensitive to factors, including economic and social circumstances and ethnicity, which can impact children and families' lives.

Abuse:
Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects. Children may be abused in a family or in an institutional or extra-familial contexts by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

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

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 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)
- ensure access to appropriate medical care or treatment
- provide suitable education

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

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

Child Sexual Exploitation
Is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and / or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Child Criminal Exploitation (County Lines)
Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity, drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

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Child on Child abuse

Children can abuse other children. This is generally referred to as child on child abuse and can take many forms. This can include (but is not limited to): bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiation/hazing type violence and rituals.

Forced Marriage

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

Definitions:

An Arranged Marriage:

Whilst both the spouses' families take a lead role to arrange the marriage the choice to accept the arrangements remains with the individuals themselves.

A Forced Marriage:

Coercion is often involved to force someone in to marriage against their wishes.

This can include someone with learning difficulties who is unable to consent.

Coercion can include

physical, financial, sexual or emotional pressure. Forced marriage is therefore a form of domestic abuse or child abuse.

Honour Based Violence:

'Honour' based violence is a crime which is committed to protect or defend the perceived honour of the family and / or community.

Both Forced Marriage and Honour Based Violence is a fundamental abuse of someone's human rights

FGM

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.

Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment can occur between two children of **any** age and sex. It can also occur through a group of children sexually assaulting or 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. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that **all** victims

are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Sexual violence
It is important that school staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual harassment
When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:
- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering

when any of this crosses a line into sex u al violence - it is important to talk t o and consider the experience of the victim) an displaying pictures, photos or drawings of a sexual nature; and

- online sexual harassment This may be standalone , or part of a wider pattern of sexual harassment and/or sexual violence. This may include:
- no -consensual sharing of sexual images and videos;
- sexualised online bullying and sexting
- unwanted sexual comments and messages, including, on social media;
- sexual exploitation; coercion and threats; and
- upskirting

Upskirting

'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

Serious Violence

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self- harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Children missing from education

Children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future..

Vulnerabilities to Extremism

Children are vulnerable 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.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a referral to the Channel programme.

The Prevent duty
All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

Channel
Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

Further information regarding the signs and indicators of abuse are set out in the DfE guidance **Keeping Children Safe in Education** and can be found within the SIL Schools Safeguarding Handbook.

4. Policy Aims

- To ensure school takes appropriate action, in a timely manner, to safeguard and promote the welfare of all children
- To ensure responsibilities and procedures are fully understood and that everyone can recognise signs and indicators of abuse or neglect and respond to them appropriately.
- To ensure that the school's practice meets local and national guidance and all statutory requirements are in place.

5. Key Principles

- The child's needs and welfare are paramount. All children have a right to be protected from abuse, neglect or exploitation and have their welfare safeguarded.

- Keeping Children Safe in Education DfE 2025 reminds us that all staff should maintain an attitude of "*it could happen here*" where safeguarding is concerned.
- Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.
- Children should be listened to and their views and wishes should inform any assessment and provision for them. Staff should always act in the interests of the child, in order to protect them.
- The school recognises that if children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.
- The school recognises that scrutiny, challenge and supervision are key to safeguarding children.
- The school is committed to working with other agencies to provide early help for children before they become at risk of harm or require a 'child in need' statutory assessment. "*Early Help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years*." (DfE 2025)
- All staff should be aware of the early help process and understand their role in it. This includes identifying emerging problems, liaising with the designated safeguarding lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.
- "*All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments*." (DfE 2025)
- All staff have responsibility to report their concerns about a child **without delay** to the Designated Safeguarding Lead, or in their absence the deputy designated safeguarding lead(s) or other senior member of staff. This should be done both verbally and in writing, using the agreed format. Whilst the Designated Safeguarding Lead will normally make referrals to Children's Services, **anyone** can refer their concerns to children's social care directly in emergencies or if they feel they need to do so. **Safeguarding-Mate** can support any member of staff through the process of making a referral.
- Everyone has responsibility to escalate their concerns and "press for reconsideration" if they believe a child's needs remain unmet or if the child is failing to thrive and in need or if the child is at risk of harm. Concerns about a child should always lead to help for a child at some point and the child's situation should improve.
- The school will work in partnership with other agencies to promote the welfare of children and protect them from harm, including the need to share information about a child in order to safeguard them. "*Fears about sharing information cannot be allowed to stand in the way of the need to promote*

the welfare and protect the safety of children." Working Together to Safeguard Children 2023

- The school will work with other agencies to ensure any actions that are part of a multi-agency coordinated plan are completed in a timely way.
- The school will follow the Local Authority and the Local Safeguarding Children Partnership procedures and provide them with information as required.
- Staff, children and families will need support following child protection processes being followed.
- Children have a right to learn ways to keep themselves safe from harm and exploitation.

6. Legislation and Guidance

Schools and colleges must have regard for the DfE statutory guidance **Keeping Children Safe in Education** DfE 2025. **This child protection policy should be read alongside this statutory guidance and all staff must read and understand at least Part 1 and Annex B of this guidance.**

Local authorities have a duty to make enquiries under **section 47** of the **Children Act 1989** if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, to enable them to decide whether they should take any action to safeguard and promote the child's welfare. There may be a need for immediate protection whilst the assessment is carried out.

A 'child in need' is defined under the **Children Act 1989** as a child who is unlikely to achieve or maintain a satisfactory level of health or development, or their health and development will be significantly impaired, without the provision of services; or a child who is disabled. A social worker will lead and co-ordinate any assessment under **section 17** of the Children Act 1989.

Section 175 of the **Education Act 2002** places a duty on local authorities (in relation to their education functions, and governing bodies of maintained schools and further education institutions, which include sixth-form colleges) to exercise their functions with a view to safeguarding and promoting the welfare of children who are pupils at a school, or who are students under 18 years of age attending further education institutions. The same duty applies to independent schools (which include Academies and free schools) by virtue of regulations made under **section 157** of the same Act.

Working Together to Safeguard Children 2023 provides additional guidance which makes it clear that protecting children from harm and promoting their welfare depends upon a shared responsibility and effective joint working between different agencies:

Everyone who works with children has a responsibility for keeping them safe. No single practitioner can have a full picture of a child's needs and circumstances and, if children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

In addition, Working Together to Safeguard Children also reinforces the need to take action to provide early help before statutory services are required:

"Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse." DFE 2023

The school therefore understands its responsibility to engage with other professionals in Early Help / Family Help Assessments when a child's needs according to the Local Safeguarding Children Partnership's Responding to Need and Level of Needs framework sit below the requirement for a statutory assessment.

The Counter-Terrorism and Security Act 2015 places a duty upon local authorities and educational providers to 'have due regard to the need to prevent people from being drawn into terrorism'. The DfE has provided statutory guidance for schools and childcare providers: '**The Prevent Duty**' (December 2023). The guidance summarises the requirements of schools and childcare providers in terms of four general themes: risk assessment, working in partnership, staff training and IT policies. Our school will ensure that staff are aware of the indicators of extremism and radicalisation, why learners may be susceptible to being drawn into terrorism and know how to respond in keeping with local and national guidance by completing regular training in relation to Prevent. Staff will use their judgement in identifying children who might be at risk of radicalisation, look out for concerning changes in behaviour and act proportionately which may include making a referral via Children's Services to the Channel programme. Equally children will be made aware of the risks and support available to them. We will ensure that children are safe from terrorist and extremist material when accessing the internet in schools. The Government has developed an 'educate against hate' website providing information and resources for schools and parents to support them to recognise and address extremism and radicalisation in young people. As a school we will complete a risk assessment which assesses how our learners or staff may be at risk of being radicalised into terrorism, including online. Where specific risks are identified, we have developed an action plan to set out the steps they will take to mitigate this risk. This is proportionate and based on an understanding of the threat and risk in our local area, the phase of education and the size and type of our setting. Liverpool is a priority area, therefore schools can seek additional advice, guidance and training from the Local Authority's Prevent Coordinator and the Local Authority's Prevent Education Officer (details in SIL's Safeguarding Handbook).

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a **statutory duty upon teachers** along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at:
www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also still consider and discuss any such case with the school or college's designated safeguarding lead and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. DFE 2023

New Heights School will also consult the government guidance **Multi-agency statutory guidance on female genital mutilation** (updated 2020) and will have reference to guidance provided by the National FGM Centre **FGM Schools Guidance - National FGM Centre**.

In addition, New Heights School recognises the important role schools have in safeguarding children from **Forced Marriage**. The Forced Marriage Unit has published **Multi-agency statutory guidance**, with points 8.1, 8.2 and 8.3 focusing on the role of schools and colleges. New Heights School is clear that when it comes to the marriage of a child, the distinction between a forced marriage and an arranged marriage does not exist. Following the **Marriage and Civil Partnership (Minimum Age) Act 2022**, which came into force in February 2023, it is an offence to engage in any conduct for the purpose of causing a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. Such a marriage is deemed a forced marriage. (The same legislation also provides that the minimum age at which one can legally marry or enter into a civil partnership in England and Wales is 18.) School and college staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 (Monday to Friday 9.00am – 5.00pm) or email: fmu@fco.gov.uk.

The **Teachers' Standards** (DfE 2013, updated 2021) also requires all teachers to "*uphold public trust in the profession and maintain high standards of ethics and behaviour, within and outside school, by:*

- *treating pupils with dignity, building relationships rooted in mutual respect, and at all times observing proper boundaries appropriate to a teacher's professional position*
- *having regard for the need to safeguard pupils' well-being, in accordance with statutory provisions*
- *showing tolerance of and respect for the rights of others*
- *not undermining fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs*
- *ensuring that personal beliefs are not expressed in ways which exploit pupils' vulnerability or might lead them to break the law*."

In addition, the **Sexual Offences Act 2003** makes it clear that all members of staff are in a position of trust and would therefore be committing a criminal offence to have a sexual relationship with a young person below the age of 18, even if that pupil is over the age of consent. In addition, it would be a breach of trust to have a relationship with any school student over the age of 18.

The **Human Rights Act 1998** sets out fundamental rights and freedoms that everyone is entitled to and contains the Articles and protocols of the **European Convention on Human Rights** that are deemed to apply within the UK. It compels public organisations to protect and respect an individual's human rights when they make decisions about them. Under the human Rights Act it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific convention rights applying to schools and colleges are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, and
- Protocol 1, Article 2: protects the right to education

We recognise that being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances.

Schools and colleges also have obligations under the **Equality Act 2010** (updated 2018) whereby schools and colleges must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics). Whilst all of the above protections are important, in the context of safeguarding, Keeping Children Safe in Education, and the legal duties placed on schools and colleges in relation to safeguarding and promoting the welfare of children, governing bodies and proprietors should carefully consider how they are supporting their pupils and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender

reassignment and race. Guidance to help schools understand how the Equality Act affects them and how to fulfil their duties under the act can be found at **Equality Act 2010: advice for schools**.

In addition, the **Public Sector Equality Duty** places a general duty on schools and colleges to have due regard to the need to eliminate unlawful discrimination, harassment and victimisation, to advance the equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. The duty applies to all protected characteristics and specific consideration must be given to equality implications such as, for example, the need to eliminate unlawful behaviours that relate to them such as sexual violence and sexual harassment, misogyny/misandry and racism. Further information can be found in the document **Technical Guidance on Public Sector Equality Duty: England (updated 2023)**.

New Heights School and this policy also takes account of additional guidance including:

- **CSE Definition and guidance for practitioners** DfE 2017
- **Criminal Exploitation of children and vulnerable adults: County Lines Guidance** DfE 2023
- **Disqualification under the Childcare Act** DfE 2006
- **Information sharing: Advice for practitioners providing safeguarding services** DfE 2024
- **The Prevent Duty: safeguarding learners vulnerable to radicalisation** DfE 2023
- **How social media is used to encourage travel to Syria and Iraq** DfE 2015 (Briefing note for schools)
- The **Ofsted School Inspection Handbook** and Ofsted guidance: **Inspecting safeguarding in early years, education and skills**
- **What to do if you are worried a child is being abused: Advice for practitioners** DfE 2015
- **Sharing nudes and semi-nudes: advice for education settings working with children and young people** DFSIT/ UKCIS 2024
- **Serious Violence Duty: statutory guidance** Home Office 2022
- **Domestic Abuse: statutory guidance** Home Office 2022
- **Working together to improve school attendance** DfE 2024
- **Searching, screening and confiscation: advice for schools** DfE 2023
- Other DFE statutory guidance including: online safety and children who go missing from home or care is found here: **https://www.gov.uk/topic/schools-colleges-childrens-services/safeguarding-children**

7. Communicating with parents and visitors

New Heights School is committed to the principles of Working Together to Safeguard Children which states that "*A child-centred approach is fundamental to safeguarding and promoting the welfare of every child. All practitioners should follow the principles of the Children Acts 1989 and 2004. These Acts make clear that the welfare of children is paramount and that they are best looked*

after within their families, with their parents playing a full part in their lives, unless compulsory intervention in family life is necessary."

The following statement is provided to parents/carers so they are aware of the school's responsibilities:

"New Heights School ensures children learn in a safe, caring and enriching environment. Children are taught how to identify risky, unsafe or problematic situations, how and when to seek help, how to develop positive and healthy relationships and how to avoid situations where they might be at risk including by being exploited.

New Heights School also has a statutory responsibility to share any concerns it might have about a child in need of protection with other agencies and in particular police, health and children's services. Schools are not able to investigate child protection concerns but have a legal duty to refer them. In most instances the school will be able to inform the parents/carers of its need to make a referral. However, sometimes the school can in certain circumstances share information without the consent of the family and may be advised by children's services or police that the parent/carer cannot be informed whilst they investigate the matter or make enquires. We understand the anxiety parents/carers understandably feel when they are not told about any concerns from the outset. The school follows legislation that aims to act in the interests of the child.

New Heights School will always seek to work in partnership with parents and other agencies to ensure the best possible outcomes for the child and family."

Parents / carers are able to access this policy via the school website.

The following notice is made available to all visitors in reception. In addition, all visitors are provided with additional safeguarding guidance.

Our school is committed to safeguarding children and promoting children's welfare and expects all staff, governors, volunteers and visitors to share this commitment and maintain a vigilant and safe environment. Everyone has a responsibility to act without delay to protect children by reporting anything that might suggest a child is being abused or neglected. We would expect you to also report to the headteacher or Designated Safeguarding Lead any behaviours of any adults working in the school that may concern you. By signing our visitors book you are agreeing to follow the school's safeguarding advice to visitors and where appropriate the code of conduct for staff and volunteers.

The names and photographs of the Designated Safeguarding Lead and those who deputise for them are displayed in reception and the staffroom.

8. Roles and responsibilities

Co-Headteacher's are: Jenny Hughes (KS2 and KS3), Kevin Unsworth (KS4)

The Chair of Governors is: Ian Andain

The Designated Safeguarding Lead for Child Protection is: Jenny Hughes (KS2), Christine Plunkett (KS3), Jenny Smith (KS4)

The Deputy Designated Safeguarding Lead is: Liz Heague (KS2), Alan Gibbons (KS3), Dawn Melia (KS4)

The Designated Teacher for Looked-after Children is: Emma Fillingham (KS2), Jenny Hughes (KS3), Jenny Smith (KS4)

The nominated Link Safeguarding/Child Protection Governor is: Chris Little

The nominated Governor for dealing with allegations against the Co-Headteacher is: Ian Andain

The Senior Mental Health Lead is: Liz Heague (KS2), Lisa Kenny (KS3), Naomi Wright (KS4)

All staff (and volunteers) should:

- Contribute to ensuring students learn in a safe environment.
- Maintain the belief that "*it could happen here'*".
- Read and understand as a minimum Part 1 and Annex B of the DfE guidance Keeping Children Safe in Education 2025 and engage in training which enables them to identify children who may need additional help or who are suffering or likely to suffer significant harm and take appropriate action. Staff should have an understanding of the specific safeguarding issues outlined in Part 1 and Annex B of Keeping Children Safe in Education e.g. fabricated or induced illnesses, faith abuse. Staff should be aware that behaviours linked to drug taking, alcohol abuse, truanting and sexting can put children in danger. Staff should be alert to the signs of child on child abuse and take appropriate action.
- Have access to Section 1 of the Schools Safeguarding Handbook which will further support knowledge and understanding of key issues to enable them to identify and respond to children who need additional help. Staff will ensure that they have read and understood this document.
- Recognise that any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help 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 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 experienced multiple suspensions, is at risk or being permanently excluded from schools, colleges and in an Alternative Provision or Pupil Referral Unit
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- 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 problems and domestic abuse
- is misusing alcohol or other drugs themselves
- has returned home to their family from care
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is showing early signs of abuse and/or neglect
- is a privately fostered child
- is persistently absent from education, including persistent absences for part of the school day

- Be aware that safeguarding incidents and/or behaviours can be associated with factors outside of the school or college and/or can occur between children outside of these environments. All staff should consider whether children are at risk of abuse or exploitation in situations outside of their family home. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence.
- Be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are well placed to observe children day to day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- Understand that where children have suffered abuse or neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. All staff should be aware of how these experiences can impact on a child's mental health, behaviour and education.
- Understand that all staff play an important part in working to prevent sexual harassment, online sexual abuse and sexual violence between children. Staff will assume that these behaviours are happening in our school and will work as part of a whole school approach to address such issues, including via the curriculum. Staff will understand how to handle reports of sexual violence or harassment.
- Staff must ensure that they appropriately challenge any form of derogatory and sexualised language or behaviour to ensure that everyone is respectful at all times.
- Understand that schools and colleges play a crucial role in preventative education and this is most effective in the context of a whole-school

approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment.

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

- Report any concerns about a child's welfare without delay to the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead or in their absence a senior member of staff.
- Ensure that they record their concerns using the school's agreed reporting procedure This should be via face to face conversation at the earliest possible moment during the school day so that the risk to a child is minimised. This will then be followed up with a record on the CPOMS system as directed by the DSL in a contemporaneous and professional fashion. On occasion that the DSL or Deputy DSLs are unavailable, any concerns must be passed to a Senior member of staff who will then immediately contact one of the Deputy DSLs or the DSL. Records will note the difference between fact and opinion. The child's voice will be made clearly evident.
- Understand that records of concerns could be requested as part of a police and/or social care investigation, or any court proceedings, as well as through a Subject Access Request.
- Ensure that concerns relating to children remain confidential and are only shared with the appropriate safeguarding staff.
- Understand that any member of staff can make a referral to children's services should that be required, informing the Designated Safeguarding Lead of any action taken.
- Understand their responsibility to escalate their concerns and "press for reconsideration" if a child remains at risk or their needs are not met or if it appears that the school is not taking effective action in line with expected procedures. This includes the understanding that any member of staff can make a referral to Children's Services if required to do.
- Teachers and those providing teaching **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out.
- Be aware safeguarding issues can manifest themselves via child on child abuse.
- Understand that it may be appropriate to discuss with the Co-Headteacher's matters outside of work, which may have implications for the safeguarding of children in the workplace. This includes information about themselves. Staff will ensure that they are aware of the circumstances where this would be applicable.
- Report any concerns (including those which might be considered to be low level concerns) about the behaviour of an adult towards a child without delay to the Co-Headteacher's, Designated Safeguarding Lead, Chair of Governors

or if required the Local Authority Designated Officer for Allegations against Staff.

- Follow the school's policies including this child protection policy and the school's code of conduct for adults and the **Guidance for safer working practice for those working with children and young people in education settings** (2022)
- Understand the circumstances where it may be necessary to "self-report" incidents where they could have found themselves in a situation which could be misinterpreted, or may appear compromising to others, or if they have behaved in a manner which, on reflection, they consider to fall below the standards set out within the code of conduct for staff.
- Be aware that behaviour by themselves, those with whom they have a relationship or association, or others in their personal lives (in or out of school or online), may impact on their work with children.
- Be aware that if their role is within the scope of the Childcare Act 2006 and they commit a relevant offence that would appear on their DBS certificate or they become disqualified under the Childcare Act 2006, then they must inform their relevant Co-Headteacher.
- Be aware that they should inform their Co-Headteacher of any cautions, convictions or relevant order accrued during their employment, and/or if they are charged with a criminal offence.
- Understand that some children, including those with Special Educational Needs or Looked After, may be more vulnerable to abuse.
  "*Children with special educational needs and disabilities (SEND) or certain health conditions can face additional safeguarding challenges. This can include:*
  - *assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;*
  - *these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;*
  - *the potential for children with SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and*
  - *communication barriers and difficulties in overcoming these barriers*." (DfE 2025)

  The DFE has provided additional practice guidance '**Safeguarding Disabled Children**' DfE 2009.
- Have access to the school's managing allegations against adults procedures and whistle blowing policy. In addition, the NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8am to 8pm, Monday to Friday and 9am to 6pm at weekends, or email: help@nspcc.org.uk.
- Have access to **What to do if you are worried a child is being abused 2015: Advice for practitioners** DfE 2015
- Understand that any indication of failure to follow any of the procedures set out within this policy will lead to a formal investigation by the school.

The Governing Body should ensure that:

- New Heights School meets the statutory responsibilities set out in Keeping Children Safe in Education DfE 2025 and Working Together to Safeguard Children 2023.
- New Heights School has a strategy for providing early / family help together with other agencies and supporting children and families by carrying out early help assessments, drawing upon the Local Safeguarding Children Partnership (LSCP) 'Responding to Needs Framework.'
- The child protection policy is reviewed at least annually by the full governing body and available to parents, normally via the school's website.
- All adults working within the school are aware of the school's code of conduct and this guidance is in keeping with the Guidance for safer working practice for those working with children and young people in education settings (Safer Recruitment Consortium 2022)
- New Heights School's practice is reviewed in line with Local Authority guidance, Local Safeguarding Children Partnership (LSCP) priorities and procedures and any actions identified in the Local Authority 175 Audit are completed.
- There is a named Designated Safeguarding Lead who is a member of the school leadership team. Governors will ensure that this person has the appropriate status and authority within the school to carry out the duties of the post. They will be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children. There are colleagues trained to provide cover for the role. Governors will ensure that all staff undertaking the role of Designated Safeguarding Lead or Deputy will have this role explicitly described within their job description.
- New Heights School has procedures in keeping with the LSCP for dealing with any allegations made against any adult working within or on behalf of the school.
- There is a nominated governor, usually the chair, who is the case manager for managing any allegations against the Co-Headteacher.
- There is an additional nominated safeguarding governor to liaise with the Designated Safeguarding Lead and champion child protection/safeguarding on behalf of the safeguarding body.
- New Heights School follows safer recruitment procedures, including the statutory pre-employment checks on all staff working with young people. The Chair of Governors and safeguarding governor together with the headteacher review the school's single central record.
- New Heights School itself is a safe environment where the views of children and families are listened to and where children are taught about safeguarding and how to keep themselves safe, including on the internet or when using new technology. Any complaints about services lead to improvements in practice.

- Ensure the school audits the health and safety of the school environment and any actions arising from the audit are addressed.
- There is a nominated governor responsible for ensuring that the Meeting digital and technology standards in schools and colleges DfE 2025 are met.
- The school has appropriate filtering and monitoring systems in place for IT systems, regularly reviews their effectiveness and encourages safe and responsible use of digital technologies.
- That staff and the leadership team have an awareness and understanding of the provisions in place for filtering and monitoring and manage them effectively and know how to escalate concerns when identified.
- It scrutinises the impact of the school's safeguarding training strategy and plan so that all staff, including temporary staff and volunteers, are aware of the school's child protection procedures. All staff must have child protection training which is regularly updated and forms part of an integrated, aligned training programme which is considered as part of the whole school safeguarding approach and wider staff training and curriculum planning. The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads undertake training in keeping with statutory training.
- Ensure that all governors and trustees receive appropriate safeguarding and child protection (including online safety) training at the point of induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that policies and procedures are effective and will support the delivery of a robust whole school approach to safeguarding. This training should then be regularly updated. Governors who also undertake a child facing role in school (either in a paid or voluntary capacity) will in addition, complete the school's safeguarding training for staff and volunteers.
- There is effective analysis of safeguarding data including bullying, attendance, exclusions, behaviour logs, incidents of sexual violence or harassment, pupils taken off roll, the views and progress and participation of vulnerable students.
- All safeguarding practices are quality assured by the leadership team, including the auditing of safeguarding records and the supervision of the Designated Safeguarding Lead and other members of the safeguarding team.
- The governing body will appoint an appropriately trained designated teacher to promote the educational achievement of children who are looked after or have been previously looked after.
- There are clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.
- There are clear systems and processes in place to identify and respond to issues of sexual violence, sexual harassment or harmful sexualised behaviours between children, including a sequenced curriculum designed to specifically address sexual harassment, online abuse, sexual violence and issues of consent in an age and stage appropriate way.

Governing bodies are accountable for ensuring that alongside this policy the school has a range of effective policies and procedures in place in line with local and national guidance, and for monitoring the school's compliance with them.

Neither the Governing Body nor individual governors have a role in dealing with individual child protection cases or the right to know the detail of cases (except when exercising their disciplinary functions in respect of allegations against a member of staff or investigating a complaint brought to their attention).

The Co-Headteacher will ensure that:

- The Single Central Record is up to date and the safer recruitment practices set out in Keeping Children Safe in Education 2025 are followed in line with the school's Safer Recruitment Policy and Procedures.
- At least one member of every recruitment panel has attended safer recruitment training.
- Job descriptions and person specifications for all roles make specific reference to child protection and safeguarding.
- There is a listening and transparent culture within New Heights School where both staff and children are able to raise concerns about poor or unsafe practices.
- Referrals are made to the Disclosure and Barring Service and/or the Teaching Regulation Agency as appropriate.
- They liaise with the Local Authority Designated Officer where an allegation is made against a member of staff.
- They liaise with the designated safeguarding lead in respect of any concerns raised about staff or volunteers which do not meet the harm threshold and are dealt with by means of the low level concerns policy or procedure.
- The Designated Safeguarding Lead has a job description in keeping with the requirements of Keeping Children Safe in Education and that sufficient time, training and support are allocated to this role, including the appointment of colleagues able to deputise for the Designated Safeguarding Lead who have undertaken the same training and who also have the role explicitly referenced within their job description.
- The curriculum provides opportunities to help students stay safe including when online. Children should be aware of the support available to them.
- The RSHE / PSHE / safeguarding curriculum is appropriately sequenced to ensure children are taught about key issues in a planned and age/stage appropriate way, building on previous knowledge as they move through the school.
- They quality assure the school's child protection practices including the auditing of safeguarding records and the supervision of the Designated Safeguarding Lead and other members of the safeguarding team to ensure that actions and decisions are reviewed appropriately and that staff's emotional needs are met.
- The school meets its responsibilities under the Prevent Duty including ensuring there are reasonable checks made on visiting speakers and monitoring and filtering is in place across the school's IT systems.

- All staff have had opportunity for Prevent training either through face to face training or access to online resources: **https://www.support-people-vulnerable-to-radicalisation.service.gov.uk/**

The Designated Safeguarding Lead:

The Designated Safeguarding Lead will be a senior member of staff from the school's leadership team and the role will be explicit within their job description. The school will also appoint a deputy designated safeguarding lead(s) who will be trained to the same level as the designated safeguarding lead and the role will also be explicit within their job description, however the lead responsibility remains with the designated safeguarding lead. The designated safeguarding lead will take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).

Keeping Children Safe in Education 2025 sets out the broad areas of responsibility for the Designated Safeguarding Lead within Annex C. These are detailed below.

Manage referrals

The designated safeguarding lead is expected to:

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required. The NPCC document **When to call the Police: Guidance for schools and colleges** can support with this.

Work with others

The designated safeguarding lead is expected to:

- act as a point of contact with the safeguarding partners;
- liaise with the Co-Headteacher's to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult when in contact with Police Officers who suspect them of an offence. The DSL (or deputy) will communicate any vulnerabilities known to the school to a police officer who wishes to speak to a pupil about an offence and this communication will be recorded CPOMS.

Further information can be found in the Statutory guidance - **PACE Code C 2019** updated December 2023;.

- as required, liaise with the "case manager" (as per Part four of KCSIE) and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and SENCOs or the named person with oversight for SEN in a college and Senior Mental Health Leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically;
- liaise with the school's senior mental health lead and where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health;
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- work with the Co-Headteacher's and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college. This includes:
  - ensure that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
  - support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.
- work with the Virtual School Headteacher who retains a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of children with a social worker (see non-statutory guidance Promoting the education of children with a social worker and children in kinship care arrangements);
- act as a source of support, advice and expertise for all staff.

Undertake training

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put

children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- understand the importance of the role the designated safeguarding lead has in providing information and support to children social care in order to safeguard and promote the welfare of children;
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND) and young carers;
- understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners.
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role. This includes attendance at relevant multi-agency training provided by the local safeguarding children partnership.

Raise Awareness

The designated safeguarding leads should:

- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part-time staff;
- ensure the school's or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this; and
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff. Their role could include ensuring that the school or college, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

Providing support to staff

Training will support the designated safeguarding lead in developing expertise so that they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure staff are supported during the referrals processes; and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of children

Understanding the views of children is essential to respond appropriately to their needs. It is important that children feel heard and understood. The designated safeguarding lead will be supported in developing knowledge and skills to:

- encourage a culture of listening and taking account of children's wishes and feelings, among all staff, and in any measures the school may put in place to protect them; and

- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusting relationships which facilitate communication.

Holding and sharing information

The designated safeguarding leads should be equipped to:

- understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and
- be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program, etc.

Child protection file

The designated safeguarding leads are responsible for ensuring that child protection files are kept up to date. Information is kept confidential and stored securely. Records include a clear and comprehensive summary of the concern; details of how the concern was followed up and resolved; and a note of any action taken, decisions reached and the outcome. Files are only accessed by those who need to see it and any sharing of information happens in line with information sharing advice set out in Keeping Children Safe in Education.

Where children leave the school or college (including for in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

In addition to the child protection file, the designated safeguarding leads should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard the child and help the child thrive in the new setting. A lack of information about a child's circumstances can impact on the child's safety, welfare and educational outcomes. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

Availability

During term time the designated safeguarding lead (or a deputy) should always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable.

It is a matter for individual schools and the designated safeguarding leads to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities. During out of hours / out of term activities, the Designated Safeguarding Leads and / or Deputies are directly contactable via school mobile or email or appropriate cover arrangements are made via the Co-Headteacher's. The Designated Safeguarding Leads will respond immediately upon notification of a concern.

According to Local Guidance it is expected that the Co-Headteacher will be the case manager for any allegations against staff and make referrals to the Disclosure and Barring Service and/or Teaching Regulation Agency.

In addition to the role outlined in Keeping Children Safe the Designated Safeguarding Lead is also expected to ensure that:

- The school has a specific safeguarding email account safeguarding@newheighytsschool.co.uk which is accessible by all members of the safeguarding team and ensures that all communication of a safeguarding nature is seen and responded to by the school on a daily basis.
- The social worker is notified if a child subject to a child protection plan is absent without explanation.
- The social worker is informed when a child subject to a child protection plan or a child in need plan moves to a new setting.
- A training log is kept of all child protection training including the names of those attending. All staff must have regular training and updates. Staff or volunteers who are unable to attend training will be offered the chance to receive missed training at the earliest opportunity.
- Child protection records are kept securely and separately from the child's normal file. Records will be transferred and/or retained in keeping with the Local Authority and NSPCC guidance.
- New Heights School attends and contributes to child protection case conferences and child in need meetings, ensuring actions are completed in a timely manner. The school will complete the LSCP agency report ahead of each child protection conference.
- New Heights School escalates its concerns with other agencies when a child's needs are not being met following the Local Safeguarding Children Partnership Escalation and Resolution Policy.

- All members of the safeguarding team have received appropriate training; that all referrals made are quality assured and that regular safeguarding supervision is provided to the safeguarding team to monitor all decisions and actions taken alongside the well-being of each team member.
- All staff read and understand part 1 and Annex B of Keeping Children Safe in Education and make available to them other key documents and guidance.
- New Heights School has an appropriately trained member of staff in order to fulfil its obligations under Operation Encompass, and that the school's commitment to Operation Encompass is known throughout the school community via the means of staff training, parental letters, posters and the school website.

9. Safeguarding Framework

In addition to this child protection policy the school has procedures or policies in relation to other areas for safeguarding children including:

- attendance
- administering medicines
- anti-bulling including cyber bullying
- alternative and off-site provision
- behaviour for learning
- care and control
- code of conduct for staff, governors and volunteers (guidance on safer working practices)
- children in care (Looked After Children)
- clubs, trips, educational visits and extended school activities
- data protection
- drug and substance misuse
- disability objectives and accessibility plan
- equal opportunities
- emergency planning
- evacuation and lock-down procedures
- first aid
- intimate care
- managing allegations against staff and volunteers
- mental health and wellbeing
- online safety and acceptable use policies
- risk assessments
- safeguarding advice for visitors
- safer recruitment practices
- school and site security
- separated parents
- sex and relationships education
- special educational needs and disabilities
- taking and using photographs
- whistleblowing

10. Training and Induction

All staff and volunteers working at New Heights School must be aware of systems within the school which support safeguarding, and these will be explained to them as part of staff induction. All staff and volunteers will receive an induction prior to commencing work in our school. The induction will ensure the following documents and information are shared:

- child protection policy (which should amongst other things also include the policy and procedures to deal with child-on-child abuse)
- behaviour policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying).
- staff behaviour policy (sometimes called a code of conduct) should amongst other things, include low-level concerns, allegations against staff and whistleblowing
- safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods
- role of the designated safeguarding lead (including the identity of the designated safeguarding lead, deputies and/or safeguarding team members).
- copies of any other relevant policies and a copy of Part one (or Annex A, if appropriate) of KCSIE 2025

The school draws upon SIL's induction template and Safeguarding Induction Booklet (Schools' Safeguarding Handbook) to ensure all appropriate policies and guidance are shared.

All staff and volunteers working in the school must complete safeguarding training appropriate to their role as part of their induction and at a minimum of annually thereafter. As part of the requirement for all staff to undergo regular updated safeguarding training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring), safeguarding training will be integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning. The school's safeguarding training plan will build upon existing staff knowledge, in addition to refreshing key knowledge, and will be pertinent to the needs of the school community and local context. Safeguarding training provided to staff and volunteers will also be relevant to the age and stage of the children within our school community. In addition, all staff will receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required to continue to provide them with relevant skills and knowledge to safeguard children effectively. Every Friday ALL staff are required to complete the Weekly Safeguarding question.

All staff are required to complete the following training at the commencement of the new Academic year:

Reading Tasks - information shared on the intranet.

https://sites.google.com/newheights.liverpool.sch.uk/school-intranet/home

- Read and Understand Keeping Children Safe (2025) – Part 1 and Annex B
- Read and Understand Guidance for safer working practice for those working with children and young people in education settings (Feb 2022)
- Read and Understand Staff Code of Conduct (2025-26)
- Read and Understand the Safeguarding Policy (2025-26)
- Read and Understand Staff Handbook (2025-26)
- Read and Understand what to do if I am worried a child is being abused - Advice for practitioners (DFE 2015)
- Read and Understand Ringing 999 for an Ambulance, A Guide for Education
- Read and Understand What do I do when I'm worried about the mental or emotional well being of a young person Guidance
- Read and Understand How to help: Self Harm Guidance

Online Safeguarding Training:

Please follow the links below to complete the online training:

Keeping Children Safe in Education 2025, part 1 assessment:

https://my.thekeysupport.com/signup-for-elearning/f7c342bd-2b41-493c-a234-9af5046c6372?src=stc_link

Safeguarding and child protection: the essentials 2025/26

https://my.thekeysupport.com/signup-for-elearning/87ef65d9-e378-413d-9a20-ec4e002fb7c7?src=stc_link

If a member of staff is a new appointment during the academic year, then they will be required to complete the training during their induction.

All staff are also required to attend and participate in all safeguarding training and CPD sessions throughout the academic year, provided by either the school's safeguarding team or external professionals, eg NSPCC and PACE (Parents Against Criminal Exploitation) training, LCC Prevent Refresher Training, Liverpool Foundation County Lines Awareness, Operation Encompass training, Mental Health training, Anti-Bullying training.

The Designated Safeguarding Lead and deputies must complete safeguarding training relevant to their role. This level of training must be refreshed at least every two years, with further safeguarding training to be accessed on a minimum of an annual basis as best practice. This is to ensure designated staff have appropriate, up to date knowledge and skills which will enable them to identify concerns and make decisions that support the safety of the school community.

The governing body should receive appropriate safeguarding and child protection (including online safety) training at the point of induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that policies and procedures are effective and will support the delivery of a robust whole school approach to safeguarding. This training should be regularly updated. Governors who also undertake a child facing role in school (either in a paid or voluntary capacity) will in addition, complete the school's safeguarding training for staff and volunteers. The Link Governor for Safeguarding should attend appropriate training to enable them to fulfil the expectations of the role.

All staff have had opportunity to attend Prevent training either through face to face training or access to online resources: https://safeguarding.thekeysupport.com/preventing-radicalisation/?marker=full-search-q-prevent-result-0

The school will keep a safeguarding training log evidencing the training attended by the different groups of staff/governors and will seek to evidence the ongoing impact of this training.

11. Procedures for reporting child protection or child welfare concerns:

- All members of the school community have a statutory duty to safeguard and promote the welfare of children and young people. Staff and governors should not investigate possible abuse or neglect themselves.
- SIL provide an online resource 'Safeguarding-Mate' to support/guide colleagues decision making when they have a concern about a child or the behaviour of an adult: https://sil-ltd.co.uk/safeguarding-mate/
- All concerns should be reported without delay directly to the Designated Safeguarding Leads and / or Designated Safeguarding Deputies, Co-Headteacher's or any member of the School Leadership Team. This should be via face to face conversation at the earliest possible moment during the school day so that the risk to a child is minimised. This will then be followed up with a record on the CPOMS system as directed by the DSL in a contemporaneous and professional fashion. On occasion that the DSL or Deputy DSLs are unavailable, any concerns must be passed to the Head of School or a Senior member of staff who will then immediately contact one of the Deputy DSLs or the DSL.
- Consideration will need to be given to immediately protecting the child and contacting the police and/or ringing for an ambulance if the child is injured.
- The Designated Safeguarding Lead or Deputy Designated Safeguarding Lead will take immediate action without delay and will make a referral to children's services by telephone if a child is believed to be suffering or likely to suffer significant harm. This referral will always be followed up in writing.
- Children's Services contact details are as follows:

Liverpool CASS 0151 459 2606
Halton iCART 0151 907 8305 (Out of hours 0345 050 0148)
Knowsley MASH 0151 443 2600
Lancashire 0300 123 6720 (Out of hours 0300 123 6722)
Sefton CHAT 0151 934 4013 (Out of hours 0151 934 3555)
St Helens Contact Centre 01744 676767 (Emergency Duty Team 0345 050 0148)
Warrington 01925 443322 (Out of hours 01925 444400)
Wigan Duty Team 01942 828300 (Emergency out of hours duty 0161 834 2436)
Wirral Integrated Front Door 0151 606 2008 (Out of hours 0151 677 6557)

- The Designated Safeguarding Lead or Deputy Designated Safeguarding Lead will follow the LSCP and Local Authority multi-agency procedures and consider the child's needs alongside the LSCP's Levels of Needs/Responding to Needs Framework (Threshold document) and consider whether an early help assessment or referral to children's services is needed: https://liverpoolscp.trixonline.co.uk/
- The Designated Safeguarding Lead or Deputy is able to refer to an online tool which helps professionals assess a child's level of need and decide which method of referral they should complete (FHA or MARF). The online 'Levels of Need Slider' tool can be accessed here: **https://liverpool.gov.uk/referrals/childrens-social-care-referrals/make-an-urgent-marf-referral/** Schools can also make a Level 3 Family Help referral using the following link: **https://liverpool.gov.uk/referrals/childrens-social-care-referrals/access-early-help-support/**
- Concerns about a child should always lead to help for a child. The school may need to escalate its concerns with Children's Services to ensure a referral is accepted or work with other agencies to ensure an Early Help / Family Help Assessment is completed.
- New Heights School will always seek to follow the Local Safeguarding Children Partnership procedures which can be found on their website.
- If school does not receive feedback within one working day regarding the outcome of a referral made to Children's Services, the Designated Safeguarding Lead will contact Children's Services immediately to determine the outcome of the referral.
- If school disagrees with the outcome of a referral, the Designated Safeguarding Lead will ask to speak to the social worker and/or manager who made the decision. Following this conversation, if they remain dissatisfied they will follow the Local Safeguarding Children Partnership Escalation and Resolution Procedures.

"SIL Schools' Safeguarding Handbook" and Part 1 of Keeping Children Safe in Education 2025 provides key flowcharts and guidance to support staff and volunteers' understanding and decision making. This will support staff to make a referral themselves should that become necessary. The Designated Safeguarding Lead should be informed, as soon as possible, following the need for another member of staff to make a referral.

"SIL Schools' Safeguarding Handbook" will provide additional guidance about indicators of abuse and harm and how to respond to a disclosure. Guidance is also available on the NSPCC website: **www.nspcc.org.uk/keeping-children-safe/**

If a teacher in the course of their work in the profession, discovers that an act of Female Genital Mutilation appears to have been carried out on a girl under the age of 18 the teacher must report this to the police. Keeping Children Safe in Education provides additional guidance.

Concerns that a child is being radicalised should follow the normal safeguarding referral mechanism with an additional Channel or Prevent referral being made to the Local Authority's Prevent and Channel team. Contact details can be found in the School's Safeguarding Handbook.

12. Process to follow if a child makes a disclosure

If a child makes a disclosure of abuse, staff should:

- Listen and keep calm. Do not interrupt
- Not promise the child that they will keep the matter confidential. Explain to the child who they will need to tell and why
- Observe visible bruises and marks, but should not ask a child to remove or adjust their clothing to view them
- Keep questions to a minimum as their role is not to investigate. If staff need to ask questions in order to ascertain whether this is a safeguarding concern, they should ensure they are open questions
- Use the "TED" model for asking open ended questions: "Tell me about that", "Explain that to me", "Describe that"
- Make a record of what has been said immediately afterwards in words used by the child and the member of staff to the best of their memory. Use capital letters for the child's words to help distinguish between the two.
- Note anything about the child which is connected i.e. any visible injuries including the position and description, the demeanour of the child i.e. crying, withdrawn etc.
- Clearly indicate whether fact, opinion or third party information
- Report the matter immediately to the Designated Safeguarding Lead
- Seek advice from the Designated Safeguarding Lead if in doubt

Staff should not:

- Ask leading questions, put words into the child's mouth or press for details
- Rush the child
- Examine the child
- Investigate
- Promise confidentiality
- Summarise or use your own words to describe events
- Delay sharing the information with the Designated Safeguarding Lead

Further information can be found in part 1 of the SIL Schools Safeguarding Handbook.

All staff should also be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

13. Confidentiality, information sharing, record transfer and record keeping and retention

Information sharing is vital in identifying and tacking all forms of abuse and neglect, and in promoting children's welfare, including their education outcomes. Schools have clear powers to share, hold and use information for these purposes.

The school recognises that all matters relating to child protection are confidential. The Co-Headteacher's, Designated Safeguarding Lead and/or Deputy will disclose any information about a child to other members of staff on a 'need to know basis' only. Guidance about sharing information can be found in the 2018 document **Information Sharing: Advice for Practitioners providing safeguarding services to children, young people, parents and carers 2024** and the **Data protection guidance for schools (2024)**. The school understands the need to keep child protection and safeguarding records securely. All records are stored securely in locked filing cabinets within the DSL locked office and / or within the electronic CPOMS reporting system. All documents are transferred in person and / or via CPOMS online transfer system separately to the students main student file.

Staff cannot promise children confidentiality but must always act in the best interests of the child and share disclosures made by the child or others with the Designated Safeguarding Lead. All staff are aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

New Heights School will aim to seek consent of parents before sharing information with other agencies, however legislation states that schools and other agencies can share information without the consent of a parent/carer in particular circumstances.

New Heights School pays due regard to the relevant data protection principles which allow us to share personal information, as provided for in the **Data Protection Act 2018** and the **General Data Protection Regulation** (GDPR). The

school is aware of the processing conditions under the Data Protection Act 2018 and the GDPR which allow school to store and share information for safeguarding purposes, including information which is sensitive and personal, and this is treated as "*special category personal data*". Where school would need to share special category personal data, we are aware that the Data Protection Act 2018 contains "*safeguarding of children and individuals at risk*" as a processing condition that allows us to share information. This includes allowing school to share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that we can gain consent, or if to gain consent would place a child at risk.

"The Data Protection Act 2018 and UK GDPR **do not** prevent the sharing of information for the purposes of keeping children safe and promoting their welfare...
…Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare of children" (DfE 2025)

New Heights School will transfer records securely to the next setting and discuss the child's needs before the child starts at the next setting. The Designated Safeguarding Lead will speak to their counterpart in the school to which the child is transferring in order to ensure that they are aware that the file is to be transferred. Upon confirmation of the child starting on roll the file should be transferred as soon as possible (within 5 school days), but separately to the main school file. The file should be signed upon receipt and delivered by hand wherever possible. School will follow the transfer of records protocol detailed within the Schools' Safeguarding Handbook.

The school will retain records in keeping with Local Authority guidance and NSPCC guidelines: **https://learning.nspcc.org.uk/research-resources/briefings/child-protection-records-retention-storage-guidance**. This in turn references the Information and Records Management Society (IRMS) **Information management toolkit for schools 2019**.

SIL's Safeguarding Handbook provides further key guidance for transferring records including a "Transfer of CP records Template".

14. Additional child protection guidance will be provided to all adults working with young people which will include:

- The school's child protection policy which includes the role of the Designated Safeguarding Lead
- Part 1 and Annex B of Keeping Children Safe in Education 2025
- The School's Code of Conduct for staff and volunteers
- The school's behaviour policy for children
- The name, role and contact details of all staff with safeguarding responsibilities
- Guidance for safer working practices for those working with children and young people in education settings (Safer Recruitment Consortium 2022)

- A flowchart summarising the child protection procedures
- Definitions of abuse or neglect and possible indicators
- Identified groups of children more vulnerable to abuse
- Specific guidance related to safeguarding issues including Female Genital Mutilation, Forced Marriage, Child Exploitation including sexual and criminal, Extremism and Radicalisation, Neglect, Sexual violence and harassment and online-safety.
- Dealing with allegations against staff and volunteers procedures
- Whistleblowing procedures
- What to do if you are worried a child is being abused: Advice for practitioners DFE 2015
- Ringing 999 for an Ambulance, A Guide for Education
- What do I do when I'm worried about the mental or emotional well being of a young person Guidance
- How to help: Self Harm Guidance
- Attendance policy and procedures including for Children missing in Education
- SEND policy

15. Managing allegations against adults (including all staff, supply teachers and volunteers) working at or on behalf of the school

All New Heights School staff and other adults working at or on behalf of New Heights School will be aware of and work within the school's Code of Conduct and other relevant policies and procedures. The Staff Code of Conduct includes guidance for staff regarding the school expectations of the use of mobile phones, electronic equipment and social media.

All staff and volunteers must report any concerns about a member of staff's behaviour towards children (including supply staff and volunteers) to the Headteacher who will act as the case manager. Concerns can also be discussed with the Designated Safeguarding Lead. Concerns about the headteacher should be raised with the Chair of Governors or nominated governor.

Local Safeguarding Children Partnership multi-agency procedures will be followed in all cases where it is alleged that a member of staff has:

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

The school's managing allegations against staff and volunteers policy and procedures will support everyone to take appropriate action. This includes a flowchart to guide colleagues thinking.

In some circumstances, the New Heights School will have to consider an allegation against an individual who is not directly employed by the organisation and where our disciplinary procedures do not fully apply (for example supply teachers). Whilst the school is not the employer of the individual, we still have responsibility to ensure allegations are dealt with properly and will liaise where appropriate with relevant parties. The school will not cease to use the services of a supply teacher as a result of safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome.

In addition, SIL provide an online resource "Safeguarding-Mate" to support colleagues decision making: https://sil-ltd.co.uk/safeguarding-mate/

Concerns can also be taken directly to the Local Authority Designated Officer (LADO), if needed. The Local Authority Designated Officers in Liverpool are Pauline Trubshaw and Catherine Ballans. They can be contacted on 0151 233 0840 or via email LADO@liverpool.gov.uk. Referrals should be made by emailing the LADO referral form to LADO@liverpool.gov.uk.

Part 4 of the DfE guidance Keeping Children Safe in Education provides further guidance. In addition to the school's own procedures, multi-agency procedures can be found on the school's website.

There are occasions when a person who works with children behaves in a way that is concerning and raises questions about their ability to recognise and take steps to safeguard children in their care that may not always meet the threshold of LADO. As an employer the school has a duty to consider whether the issue indicates that they are unsuitable to continue in their role for the immediate future or indefinitely. These are known as issues of suitability and if they do not meet the harm threshold for allegations they, would be dealt with via the school's disciplinary and low level concerns procedures. Issues of suitability can include:

- Where an employee is being investigated for an offence against an adult, or
- Their behaviour in their personal lives brings into question their suitability to work with children

However if an adult who works with children has involvement from Children's Services in respect of their own child, or a child that they live with or have contact with, it is the responsibility of Children's Services to assess the immediate concern and inform the LADO of whether the adult poses a risk to children. Examples of this may include:

- Allegations of assault, physical or emotional, on their own child or on a child they live with or have contact with
- Domestic abuse
- Substance misuse
- Lives with or is in a relationship with a person who is identified as a risk to children

The situation would meet the threshold of LADO should the child in question be made subject to a Child Protection plan. This is because Children's Services has determined that the adult presents a risk to the associated child either directly or due to a failure to protect.

If school are made aware of any of the circumstances detailed above, they will have a consultation with the LADO in order to determine whether the threshold is met for a referral under the managing allegations process.

All staff should ensure that they disclose information about themselves relating to the above to the Co-Headteacher's as soon as possible. School will create an environment and culture where staff are supported and empowered to be able to do this.

If the school receives an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purpose of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities), the school will follow its own policies and procedures, including informing the LADO.

16. Low Level Concerns

Our school recognises that there may be times when there are concerns about a professional's behaviour which do not meet the harm threshold as set out in section 15 of this policy. This includes third party staff and volunteers. Concerns such as this may arise in several ways and from a number of sources. Examples of this may be:

- suspicion, complaint or disclosure made by a child, parent or other adult within or outside of our school; or
- as a result of vetting checks undertaken during recruitment

New Heights School promotes an open and transparent culture in which all concerns about adults working in or on behalf of the school are dealt with promptly and appropriately. Creating this culture in which all concerns are shared responsibly, in a timely way with the Co-Headteacher's and are recorded using CPOMS StaffSafe and dealt with appropriately is critical to effective safeguarding practice. This culture enables the school to identify concerning, problematic or inappropriate behaviour at the earliest possible stage, minimises the risk of abuse and ensures that all adults working in or on behalf of the school are clear about professional boundaries and act within these, in accordance with our ethos and values. This culture also empowers individuals to share concerns with key staff about their own behaviour at the earliest possible opportunity.

The term 'low level concern' does not mean that the behaviour is insignificant. It means a behaviour towards a child which does not meet the threshold set out

in section 15 of this policy and part 4 of Keeping Children Safe in Education 2025. A low level concern is any concern (no matter how small, and even if no more than causing a sense of unease) that an adult working in or on behalf of the school may have acted in a way that:

- is not consistent with the staff code of conduct, including conduct outside of the workplace, and/or
- does not meet the allegations threshold or is otherwise not considered serious enough for a referral to the LADO.

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

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

Behaviours which are not consistent with the standards and values of New Heights School, and which do not meet the expectations set out in our code of conduct for staff, must be addressed. Behaviours such as this, can exist on a spectrum from 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.

It is essential that concerns such as this are shared responsibly and with the right person, and that they are recorded and dealt with appropriately. Effective reporting and management of such concerns also protects staff from potential false allegations of misunderstandings. Concerns should be shared as soon as is reasonably possible, and ideally within 24 hours of becoming aware of a problem, however it is never too late to share a concern.

Occasionally a member of staff may find themselves in a situation which could be misinterpreted or may appear compromising to others. Equally, a member of staff may have behaved in a manner which, on reflection, they consider to fall below the standards set out within our code of conduct for staff. Self-reporting such circumstances is actively encouraged as it allows issues to be dealt with at the earliest opportunity and it is an important means of maintaining our culture of everyone aspiring to have the highest standards of conduct and behaviour.

Staff do not need to be able to determine whether their concern is a low level concern, or if it would be dealt with under our managing allegations policy. Staff must simply be empowered to share their concern. The determination regarding process will be made by the designated safeguarding lead and Co-Headteacher's.

Low level concerns should be reported in writing to the Co-Headteacher's. Where a low level concern is in relation to the Co-Headteacher's, it should be shared with the Chair of Governors.

If a report of a low level concern is received, it will be dealt with responsively, sensitively, and proportionately. Where a concern is reported, the Headteacher should collect as much evidence as possible by speaking directly with the person who raised the concern (unless it has been raised anonymously), and by speaking to the individual involved along with any witnesses. The information collected will help to categorise the behaviour and determine what further action may needed to be taken. Support and advice will be provided to ensure any identified behaviours can be corrected at an early stage.

All low level concerns will be recorded in writing and this record should include the details of the concern, the context and the action taken, including the rationale for any decisions. Records must be kept confidential and held securely in line with the Data Protection Act 2018 and the UK General Data Protection Regulation. Records will be kept in individual personnel files and will be retained for the duration of the individual's employment.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, school will decide on a course of action either through our disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, referral to LADO.

The Co-Headteacher's will regularly review (on a weekly basis) all low level concerns reported to them, along with the outcome of the concern. This is to ensure there is appropriate scrutiny and analysis of information in order to agree at what point a series of low level concerns or a pattern of behaviour would escalate and meet the threshold set out in section 15 of this policy and part 4 of Keeping Children Safe in Education 2025.

Low level concerns will not be included in references unless they relate to an issue which would normally be included in a reference. Keeping Children Safe in Education specifies: "*Schools and colleges should only provide substantiated safeguarding concerns/allegations (including a group of low-level concerns about the same individual) that meet the harm threshold in references*."

Locally, it has been agreed that all concerns will be shared with the LADO relating to the conduct of an adult where sexual harm or sexualised behaviours have been reported, regardless of whether they are a low level concern or not. This is to ensure that concerning patterns of low level sexualised behaviour can be identified and responded to appropriately.

17. Allegations of abuse against another pupil (child on child abuse), including issues of sexual violence and harassment

New Heights School adopts a whole school approach to safeguarding, which creates a culture where there is a zero-tolerance approach to sexual violence and sexual harassment. This culture ensures that behaviours such as this at any level are never deemed acceptable and will not be tolerated in our school. We deliver a strong preventative education programme which creates an environment in which all children are supportive and respectful of each other.

Staff should recognise that children are capable of abusing other children, and that not all children will find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report, for example a friend may make a report or a member of staff may overhear a conversation. It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Victims will never be given the impression that they are creating a problem by reporting an incident and they will never be made to feel ashamed or their experience minimised.

The DfE states *"The initial response by a school or college to a report from a child is incredibly important. How the school or college responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward."*

Staff must act on the assumption that children may be experiencing sexual violence or harassment, even if there are no specific reports of such behaviour. Staff must ensure that they challenge any form of derogatory and sexualised language or behaviour. Staff should be vigilant to sexualised/aggressive touching/grabbing, particularly towards girls or other vulnerable groups of children. Behaviours by children should never be passed off as 'banter', 'having a laugh' or 'part of growing up' as this can lead to an unsafe culture which normalises abuse and inappropriate behaviours and can lead to children accepting it as normal and therefore not reporting such issues. Our school will prevent sexual harassment, online sexual abuse and sexual violence through a carefully planned and sequenced relationships, sex and health education curriculum alongside effective challenge and response to specific issues when they arise. All staff will reassure victims that they are being taken seriously and that they will be supported and kept safe.

All concerns must be reported and discussed with the Designated Safeguarding Lead, Deputy Designated Safeguarding Lead or senior member of staff. Behaviours can happen in school, online or in the community and are most likely to include, but not limited to:

- abuse within intimate personal relationships between children;
- bullying (including cyber bullying, prejudice-based and discriminatory bullying);

- serious violence;
- 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", taunting and online sexual harassment which may be standalone or part of a broader pattern of abuse;
- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes;
- displaying pictures, photos or drawings of a sexual nature;
- causing someone to engage in sexual activity without consent;
- online sexual harassment including consensual and non-consensual sharing of nude and semi-nudes images and/or videos, sharing of unwanted explicit content, AI generated CSAM, sexualised online bullying, unwanted sexual comments and messages including on social media, sexual exploitation, coercion and threats and coercing others into sharing images of themselves or performing acts they are not comfortable with online;
- upskirting, which typically involves taking a picture under a person's clothing without their permission (this is a criminal offence);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; and
- 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 many also include an online element).

When responding to reports of child on child abuse, the Designated Safeguarding Lead will respond to each report on a case-by-case basis. If an allegation is potentially criminal in nature, a report will be made to the Police. This will generally be in parallel to a referral to children's services. School can refer to the NPCC guidance **When to call the Police** for additional support.

The school will also handle reports which include an online element carefully. This includes being aware of **Searching, screening and confiscation: advice for schools** and **DfSIT & UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people 2024**.

The school recognises that Artificial Intelligence (AI) can be used to alter existing photos or videos or by creating entirely AI generated sexual images. There are also AI tools such as "nudifying" or "undress" tools which can be used to digitally remove clothing to create sexual images. Under UK law AI generated child sexual abuse material (AI-CSAM) is illegal under Section 1 of the Protection of Children Act 1978, regardless of how it is created or its photorealism. Should it be required, we will refer to the Internet Watch Foundation, National Crime Agency and CEOP's AI CSAM Guide for Professionals for further guidance when responding to incidents of this nature.

Children with special educational needs and disabilities are more vulnerable to sexual violence and harassment and staff should be aware that additional barriers can exist when recognising abuse in these children. The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm however children who are LGBT+ or perceived to be, may also be targeted by their peers and harassed or assaulted. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that all staff endeavour to reduce the additional barriers faced and provide a safe space for children to speak out or share their concerns.

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of the protections set out under the **Human Rights Act 1998**, depending on the nature of the conduct and the circumstances. In addition, the **Public Sector Equality Duty** places a general duty on schools and colleges to have due regard to the need to eliminate unlawful discrimination, harassment and victimisation, to advance the equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. The duty applies to all protected characteristics and specific consideration must be given to equality implications such as, for example, the need to eliminate unlawful behaviours that relate to them such as sexual violence and sexual harassment, misogyny/misandry and racism.

Victims of child on child sexual harm will be supported by the school's pastoral system and referred to specialist agencies including, for example, CAMHS, Brook, NSPCC and Barnardo's. All concerns must be reported and discussed with the Designated Safeguarding Leads, Deputy Designated Safeguarding Leads or senior member of staff via the existing referral procedures in school – CPOMS, in a timely manner. Each incident will be treated on a case-by-case basis, including any use of sanctions and reported to the police, as appropriate. Peer-on-peer abuse that involves sexual assault and violence must always result in a multi-agency response. We will ensure that the students affected are getting the help they need. A typical response will involve:

- children's social care
- the police
- any specialist services that support children who demonstrate harmful sexual behaviour
- the family
- any other professionals who know or have had contact with the child
- school's Safer Schools Police Officer who can liaise with families as appropriate in order to support all parties.

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis. Risk assessments (based on the Aim Project model, will be recorded (paper or electronic) and will be kept under regular

review. As part of the risk assessment, we consider the potential vulnerabilities of our students and any risks to them, including their potential abuse by others and how we support our students with regard to their sex, sexuality etc. We also take into consideration any potentially unsafe spaces on the premises, where incidents may happen and act to make sure staff do what they can to make that environment safer.

Incidents between students are followed up with Restorative Justice sessions in accordance with our Relationships and Resolution policy.

The New Heights School curriculum, in particular PSHE / RSHE proactively responds to preventing such issues from occurring and addresses incidents should they arise. The curriculum will support young people to become more resilient to inappropriate behaviours towards them, risk taking behaviours and behaviours that children may be coerced into including 'sexting' or 'initiation/hazing' behaviours.

Students will be taught about the value of positive and healthy relationships and to know and understand what language and behaviours are acceptable and what to do and who to speak to if they are worried or feel unsafe. Students will be taught about the value of positive and healthy relationships.

New Heights School staff are trained to recognise the risks to children online, including bullying, sexual and criminal exploitation and the role that c abuse can child-on-child play in that context. All staff are expected to be familiar with this guidance and to apply it. Staff should have knowledge of and understand the school's child protection policies and use them to make sure the students are safe.

Additional guidance is available on the NSPCC website:

https://learning.nspcc.org.uk/online-safety/preventing-online-abuse-and-harm

18. Children at risk of Serious Violence and/or Exploitation

All staff should be aware of the indicators which may suggest a child is at risk from or is involved with serious violent crime. These may include:

- Increased absence from school;
- A change in friendships or relationships with older individuals or groups;
- A significant decline in performance;
- Signs of self-harm or a significant change in wellbeing; or
- Signs of assault or unexplained injuries

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence crimes, such as increased absence from school, change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing and signs of assault or unexplained injuries. As well as unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of exploitation. The likelihood of involvement in serious violence may be increased by factors such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Additional information and advice can be found in the Home Office's **Serious Violence Duty; Preventing and reducing serious violence, Preventing youth violence and gang involvement** and **Criminal exploitation of children and vulnerable adults: county lines** guidance.

Engagement in education is a strong protective factor against children and young people's risk of involvement in serious violence. Through engaging in good quality education, children and young people feel a sense of belonging, achievement and are equipped with skills and resilience they need to be safe and to succeed in life. Our school recognises that we play a vital role in preventing and reducing serious violence by facilitating early interventions, prevention and safeguarding children.

Both child sexual exploitation and child criminal exploitation 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 victims 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. Child sexual exploitation and child criminal exploitation 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.

Staff will understand that whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

All staff should be aware of the indicators which may suggest a child is at risk from or experiencing child criminal or sexual exploitation. These may include:

- appear with unexplained gifts, money or new possessions;
- associate with other children involved in exploitation;
- have been the victim or perpetrator or alleged perpetrator of serious violence (e.g. knife crime);

- suffer from changes in emotional well-being;
- misuse drugs and alcohol;
- go missing for periods of time (from school or home) and are subsequently found in areas away from their home or school;
- are found in accommodation that they have no connection with; and
- regularly miss school or education or do not take part in education.

All staff will be aware that children who are involved in criminal exploitation often commit crimes themselves, therefore their vulnerability as victims is not always recognised by adults and professionals. They may still have been exploited even if the activity appears to be something they have agreed or consented to. Staff will also have an understanding of the fact that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

All staff will be aware that child sexual exploitation is child sexual abuse. Exploitation of this nature can be a one off occurrence and may happen without the child's immediate knowledge e.g. through the sharing of videos or images. It can also affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. because they believe they are in a genuine relationship.

New Heights School understands that children who have been exploited or are at risk of serious violence, will need additional support to help maintain them in education. Further guidance is provided to staff in Section 1 of the Schools' Safeguarding Handbook.

19. Domestic Abuse and Operation Encompass

All staff and volunteers are aware that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

The **Domestic Abuse Act 2021** and Keeping Children Safe in Education recognises children as victims of Domestic Abuse in their own right and sets out statutory multi-agency responsibilities, including specific responsibilities on education providers. Amongst other things, these include how school deliver an effective PSHE / RSHE curriculum which supports children to recognise and report feelings of being unsafe, and covers the concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape,

domestic abuse, forced marriage, 'honour'-based abuse and FGM, and how these can affect current and future relationships.

New Heights School is part of **Operation Encompass**. Operation Encompass is a national police and education early intervention safeguarding partnership which supports children and young people who experience Domestic Violence and Abuse. Operation Encompass enables every child to receive support, regardless of whether the incident has been recorded as a crime and regardless of whether there is involvement with children's services. Operation Encompass means that the police will share information with our school about all police attended Domestic Abuse incidents which involve any of our children prior to the start of the next school day.

In order to support the school's response, key members of staff have undertaken specific training related to Operation Encompass.

Our Designated Safeguarding Leads and deputy Designated Safeguarding Leads undertook training on 6th and 8th October 2025. The Co-Headteachers also attended the Headteacher's Safeguarding Briefing training on 5th November 2025.

Key information about the principles of Operation Encompass has been cascaded to all other school staff and Governors. This includes discussing with staff how we can support children who are experiencing Domestic Abuse on a day-to-day basis and particularly following an Operation Encompass notification. No actions taken by school will put the child/ren or adult victim at risk.

New Heights School ensures that parents are fully aware of Operation Encompass and when a new child joins our school we ensure that the parents/carers are informed about Operation Encompass.

Operation Encompass notifications are stored in line with all other confidential safeguarding and child protection information via the CPOMS reporting system.

All Operation Encompass data (including new MfH notifications) will form part of the termly safeguarding report to Governors. All information is anonymised for these reports.

The school has used the Operation Encompass Key Adult Responsibilities checklist to ensure that all appropriate actions have been taken.

From March 2024 using Operation Encompass, Merseyside Police share information with our school about all children who are or who have been missing from home or care (MfH). The Key Adult (DSL) and their deputy/s (DDSLs) have completed the online Operation Encompass Key Adult training which contains a module about MfH. Information about MfH notifications have been shared

with all other school staff and Governors. Our parents are fully aware that this information is being shared with our school.

The Operation Encompass MfH information is stored in line with all other confidential safeguarding and child protection information.

Our school has discussed how we can support our children who have gone missing and how we will act following an Operation Encompass MfH notification. Our curriculum includes work in this area. We have used the Operation Encompass Handbook on MfH to inform our thinking. We are aware that we must do nothing that puts the child/ren at risk.

Should the Co-Headteacher's, DSL or DDSLs leave the school and other staff are appointed, New Heights School will ensure that all key information shared with the new Headteacher/Key Adults and that the new member of staff will undertake the Operation Encompass online training.

20. Online safety, data protection and the use of mobile phones and digital photographic equipment

It is essential that children are safeguarded from potentially harmful and inappropriate online material. Our school implements a whole school approach to online safety that sets out to protect and educate both children and staff in their use of digital technologies alongside establishing mechanisms to identify, intervene in and escalate any concerns, recognising that many children and young people have unlimited and unrestricted access to the internet via mobile phones and other digital devices.

Staff should also report any concerns about sexting (youth produced sexual imagery or 'nudes') to the Designated Safeguarding Lead, Deputy Designated Safeguarding Lead or senior member of staff who will follow the guidance in **Sharing nudes and semi-nudes: advice for education settings working with children and young people** (UK Council for Child Internet Safety, December 2024). This document provides clarity as to how staff should respond to these incidents.

The school's Online/E-safety/Acceptable Use policy clearly outlines the way in which the school uses digital technologies and there are measures in place to ensure safe, responsible and respectful use by all. This policy also includes appropriate filtering and monitoring on school devices and school networks. There is a clear code of conduct for staff and volunteers which sets out the use of digital technologies, mobile phones and personal photographic equipment around children. The school will consider, in particular, Looked after Children (Children in Care) who might be put at risk by being included in publicity materials or school photographs.

The DfE highlights the risks of new technologies:

"An effective approach to online safety empowers a school or college to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

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

The use of technology has become a significant component of many safeguarding issues such as child sexual exploitation, criminal exploitation, radicalisation and sexual abuse. Technology often provides the platform that facilitates harm.

Schools and colleges should ensure online safety is a running and interrelated theme whilst devising and implementing policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead and any parental engagement.

Staff should bring immediately to the attention of the Headteacher, Designated Safeguarding Lead or senior leadership team any behaviours by adults or children themselves that may be risky or harmful.

Our Governing Body will ensure that our school has appropriate filters and monitoring systems in place and will regularly review their effectiveness. The school will adhere to the DfE **Meeting digital and technology standards in schools and colleges** "Filtering and monitoring standards" which sets out that schools should:

- identify and assign roles and responsibilities to manage filtering and monitoring systems.
- review filtering and monitoring provision at least annually.
- block harmful and inappropriate content without unreasonably impacting teaching and learning.

- have effective monitoring strategies in place that meet their safeguarding needs

New Heights School recognises that technology, and risks and harms related to it, evolve and change rapidly. The school will carry out an annual review of our approach to online safety and will conduct a risk assessment which considers and reflects the risks our children face. We annually compete the LGfL online safety audit.

New Heights School has employed Senso's Assisted Monitoring Service to support the school's filtering and monitoring procedures. This will form part of the school's safeguarding and child protection procedures, providing a cloud-based solution integrated with our existing online safety software. This system enables real-time monitoring of student activity on school-owned devices, using AI-driven analysis combined with human moderation to identify potential safeguarding concerns. It will flag risks such as cyberbullying, self-harm, and exposure to inappropriate content, ensuring that designated safeguarding staff receive immediate alerts for timely and appropriate intervention. This proactive approach strengthens our ability to protect pupils, promotes their well-being, and helps maintain a safe and secure digital learning environment.

New Heights School recognises the significant operational and financial impacts that cyber incidents and attacks can have on schools. Our Governing Body will ensure that the school meets the DfE **Meeting digital and technology standards in schools and colleges** "Cyber security standards", which includes:

- conducting an annual cyber risk assessment which is reviewed every term
- creating and implementing a cyber awareness plan for staff and students
- ensuring that digital technology and data is secured with anti-malware and a firewall
- ensuring that user accounts and access privileges are controlled and secure
- licensing digital technology and keeping this up to date
- developing and implementing a plan to back up data (which is reviewed every year)
- reporting cyber attacks

The DfE guidance **Teaching Online Safety in Schools** (2023) also outlines how schools can ensure their pupils understand how to stay safe and behave online as part of forthcoming and existing curriculum requirements.

New Heights School recognises that generative AI platforms are becoming more widespread and commonly used, for example, ChatGPT, Microsoft Co-Pilot, Google Gemini or Adobe Firefly. Our school follows the DfE policy paper Generative artificial intelligence (AI) in education, in particular:

- we will talk about the use of these tools with staff, parents and children including their practical use alongside the potential risks (particularly with

reference to the risks associated with accuracy of information and the creation of sexualised images and deepfakes using self-generative AI)
- we are aware that the use of any generative AI in examinations is prohibited and will refer to our Behaviour Policy for any incidents of this nature
- we are conscious that children may have access to apps and exposure to AI creations on devices at home and these experiences may be both positive and negative

We also recognise that under UK law, AI generated child sexual abuse material (AI-CSAM) is illegal, regardless of how it is created or its photorealism. Should it be required, we will refer to the Internet Watch Foundation, National Crime Agency and CEOP's AI CSAM Guide for Professionals for further guidance. We share more detail and clarity about generative AI in our Online Safety policy, including the approach to the use of generative AI in our school.

Where children are asked to learn online at home, our school ensures this is done safely by referencing key guidance such as **Providing remote education: guidance for schools**, **Safeguarding and remote education** and advice from **LGfL**.

21. Children requiring mental health support

New Heights School recognises that it has an important role to play in supporting the mental health and wellbeing of our students. Staff recognise 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. Our staff are aware of how these children's experiences, can impact on their mental health, behaviour, attendance and progress at school. We recognise that in some cases, mental health problems can be an indicator that a child has suffered, or is at risk of suffering abuse, neglect or exploitation. Staff are aware of the clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

The designated safeguarding lead will regularly liaise with the senior mental health lead where safeguarding concerns are linked to mental health to ensure there is an effective and appropriate response by school. Within our school we adopt a whole school approach to mental health and wellbeing, which includes promoting positive mental health, wellbeing and resilience across the whole school community.

New Heights School has 3 recognised Senior Mental Leads that lead on issues to do with mental health, and mental health and emotional wellbeing are key components of our school's Relationship and Resolutions approach. Furthermore it is embedded into our Relationships For Learning/RSHE approach. We have 5 trained Mental Health First Aid (MHFA) Champions for students, and 2 MHFA Champions for staff.

We support students through: Daily Thrive sessions and weekly 'well being sessions and Yoga and Mindfulness Champion initiatives (KS2), YPAS Wellbeing service, ADHD Foundation Therapy support and Our intervention manager and B.E.S.T. (Behaviour and emotional support team) support students throughout the day should their difficulties regulating impact upon their learning (KS3), delivering psych-education on a range of PSHE topics and embedding Mental Health conversations throughout the curriculum whilst also providing explicit teaching on neuropsychology and the mechanisms behind mental health and well being (KS4).

Staff are also supported by Wellbeing Supervision for staff and dedicated CPD time for Mental Health and Emotional Wellbeing.

Posters around school remind staff and students of the pathway to seek support. Staff know to log all mental health concerns on CPOMS so the Safeguarding team, SENDCO and Mental Health Lead can follow the necessary escalation routes to other supportive pathways eg. Referrals to CAMHS, Fresh CAMHS and YPAS.

Our families are supported by our Family Engagement Teams who regularly refer families to supportive pathways such as School's Family Support Team.

Please refer to our Mental Health and Emotional Wellbeing policy for further information.

22. Monitoring attendance

Children who are absent from education 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. All our staff are aware of their school or college's unauthorised absence procedures and children missing education procedures.

Local Authority guidance and procedures will be followed for dealing with a child who is missing from education, particularly on repeated occasions or if a child suddenly stops attending. The school will follow the pan-Merseyside missing children protocol. For those children and families who have chronic poor attendance or severe or persistent absenteeism, school will consider whether educational neglect is present and whether a referral to children's services is required, or whether the school should seek consent to begin an Early Help / Family Help Assessment in order to coordinate a multi-agency plan of support for the child and family. School will ensure that our response is in line with **Working together to improve school attendance** DfE 2022 (updated 2024).

Attendance will be closely monitored. In line with the school's attendance policy, the attendance of children with known welfare and attendance concerns will be

monitored closely, particularly those with unexplainable and/or persistent and severe absences, or if a child suddenly stops attending. Schools should also scrutinise the attendance of off-site provision to ensure children are attending and are safe. Similarly, the attendance of children who are vulnerable or with known welfare and safeguarding concerns such as children who have a child protection plan, a child in need, are Children Looked After and/or SEN will be rigorously monitored on a daily and weekly basis. The child's social worker will be informed immediately when there are unexplained absences or attendance concerns.

It is important that the school's attendance team, including the EWO, school nurse and Safer Schools Officer, are aware of any safeguarding concerns. It is critical that when a child is not attending school their welfare is confirmed and expected practice would be for an appropriate professional to visit the home and speak to the child alone, particularly if there are any safeguarding concerns. The timing for this home visit will be determined on a case by case basis. The school will seek to ensure it has at least three emergency contacts for each family and consider what urgent action it may need to take when a vulnerable child and family are not contactable and the child has not attended school. Where necessary, this may include reporting the child missing to the police. The school will ensure it is aware, in advance, of any difficulties in accessing the premises of a child's family home.

Due to the clear link between attendance and safeguarding, the Designated Safeguarding Lead and Designated Attendance Lead will meet regularly in order to analyse and discuss data and agree future action in respect of vulnerable children.

It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, Female Genital Mutilation and forced marriage.

Where children are experiencing social, emotional or mental health issues and this is impacting on their attendance, school will refer to DfE guidance **Mental health issues affecting a pupil's attendance: guidance for schools**.

Children Missing Education (CME) are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. All staff should be aware that children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life. Children going missing can also be an indicator of mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Effective information sharing between parents, schools and local authorities is critical to ensuring that all children of compulsory school age are safe and receiving suitable education. Maintained schools have a safeguarding duty in respect of their pupils, and as part of this should investigate any unexplained absences. Academies and independent schools have a similar safeguarding duty for their pupils. When a child is deemed to be missing from education, school will make reasonable enquiries to establish the whereabouts of the child jointly with the local authority, before deleting the pupil's name from the register. Once these enquiries have been undertaken, our school will follow the local protocol for Children Missing Education and make a CME referral to the Local Authority Officer for CME.

Some parents will decide to remove their child from the school role in order to educate them at home. For the majority of children, this choice will be with the child's best education at the heart of their decision and it will be a positive learning experience. However, this is not the case for all. Elective home education can mean that some children are not in receipt of suitable education and are less visible to the services that are there to keep them safe and supported in line with their needs. Where a parent or carer has expressed their intention to remove their child from the school roll with a view to educating at home, the school will work together with other key professionals and will, where possible, attempt to facilitate a meeting. This would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has special educational needs or a disability, and/or has a social worker, and/or is otherwise vulnerable. Where a child has an Education, Health and Care plan local authorities will need to review the plan, working closely with parents and carers.. The school will also link with the named officer for Elective Home Education within the Local Authority.

23. Private fostering

The Children Act 1989, 2004 and Children (Private Arrangements for Fostering) Regulations 2005 set out that Private Fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer.

New Heights School has a mandatory duty to report to the local authority if they believe a child is subject to a private fostering arrangement. (This does not include close family relatives e.g. grandparent, brother, sister, uncle or auntie.) This means making a referral to children's services. A private fostering arrangement is made without the knowledge of the local authority for the care of a child under the age of 16 years (under 18 for children with disabilities) whereby the child is in the care of someone other than their parent or close relative. Further guidance is available in Keeping Children Safe in Education 2025 and in **Children Act 1989 private fostering**. When a child is privately fostered a social worker must carry out an assessment to ensure the placement is appropriate and consider any support needed.

Additional guidance on private fostering can be found here.

24. Safer recruitment

New Heights School will ensure that all appointments follow its recruitment policy and the guidance set out in Keeping Children Safe in Education 2025. At least one member of the appointments panel will have undertaken safer recruitment training. The school will undertake all of the required DfE pre-employments checks and where appropriate will record these checks on the single central record and retain evidence in personnel files. The school will seek written confirmation that third-party organisations including contractor and alternative education providers have

undertaken appropriate checks. The school's Safer Recruitment Policy and Procedures set out the processes in more detail and are drawn from SIL's Safeguarding Handbook.

The school is required to inform relevant staff who fall within the scope of **Disqualification under the Childcare Act 2006** and establish they are not disqualified. The criteria for disqualification under the 2006 Act and the 2018 Regulations includes inclusion on the Disclosure and Barring Service (DBS) Children's Barred List or committing a relevant offence.

25. The Safeguarding Curriculum

At New Heights School, the Safeguarding Curriculum map sets out how to help children keep themselves safe from harm. This will include messages which are taught through the **Relationships education, relationships and sex education (RSE) and health education** and PSHE curriculums, including the Topic curriculum at KS2, Relationships for Learning at KS3 and discrete PSHE lessons at KS4. Additional standalone pieces of work and messages delivered through other curriculum areas, as part of a broad and balanced curriculum. Other curriculum areas are involved in teaching children to keep themselves safe – for example students in Years 7 - 11 are taught about the dangers of risk taking and criminal behaviours when engaging with the Cells project and in Year 7 – 9 students are taught in English about online and e-safety regulations via chosen text studies and in Maths students are taught via 'real world' examples how to keep safe from online fraud and the impact of this when committed against others.

Preventative education is most effective in the context of a whole-school approach that prepares pupils and students for life in modern Britain. Our children will be provided with a safeguarding curriculum which is fully inclusive and developed to be age and stage developmentally appropriate (especially when considering the needs of children with SEND, disabilities and other vulnerabilities), and will include age appropriate skills, knowledge and understanding to help them recognise and respond to issues such as consent and healthy and respectful relationships. Children will be supported to develop their understanding, at the appropriate age, of risks including: when using technology, the internet, and risks associated with grooming and radicalisation, gang and criminal exploitation and misusing drugs and alcohol. The curriculum will include specific sequenced lessons to address sexual harassment, online abuse, sexual violence and issues of consent in an age and stage appropriate way. Our school recognises that a one size fits all approach may not be appropriate for all children, and a more personalised approach for more vulnerable children, victims of abuse and some SEND children may be necessary. Children will also learn about the wider safeguarding curriculum which for children would include road safety, anti-bullying and know how to seek support when needed. The school will ensure the curriculum promotes an understanding of the values needed to live within a democratic society including the rule of law, and individual liberty. It will promote tolerance and respect for all faiths (and those of no faith), races, genders, ages, disability and sexual orientations. The safeguarding curriculum is under constant review to protect our children, taking a reflective approach using safeguarding patterns identified in school and the local area to inform necessary changes.

The Designated Safeguarding Lead will work closely with the PSHE/RSHE/RSE lead to ensure a consistent approach to delivering key safeguarding messages throughout the curriculum, and that the curriculum appropriately reflects and responds to the needs of the school community.

26. Safeguarding children who attend off-site alternative provision

When identifying that a child would benefit from attending off site provision, New Heights School will undertake an assessment to determine that this placement is in the best interests of the child. We will ensure that the provision identified is suitable to meet the needs of that child. The school will retain responsibility for the safeguarding of any pupils we place in off-site provision. The school will undertake appropriate quality assurance checks to ensure that it is a safe place for the child to attend and will draw upon the specific guidance in the Schools' Safeguarding Handbook relating to this. The school will obtain written confirmation from the provider that the appropriate safeguarding checks have been carried out in respect of individuals working at the establishment. The school will have a formal agreement with the alternative provision and parent/carer regarding when the pupil should attend and what procedures that will be followed should the child not attend the placement. The school will ensure it seeks the views of the young people at off-site provision to ensure they feel happy and safe. When commissioning places at alternative provision, the school will pay due regard to **Working together to improve school attendance**, **Alternative provision – DfE Statutory Guidance** and **Education for children with health needs who cannot attend school – DfE Statutory Guidance**.

New Heights School is responsible for the safeguarding and welfare of pupils who are educated off site. We will ensure that the appropriate coding is used within attendance registers. If we use the B code, we have confirmed that the child is attending an education provision that is supervised, and measures have been taken to safeguard the pupil. We will ensure that we have arrangements in place where the provider of the provision will notify the school of any absences. Our attendance policy will be followed in these circumstances.

27. Complaints and Whistleblowing

Complaints about safeguarding should follow the school's complaints policy.

New Heights School recognises that children cannot be expected to raise concerns in an environment where staff fail to do so.

All staff should be aware of their duty to raise concerns, where they exist, which may include the attitude or actions of colleagues. The school's Whistleblowing Policy is there to support and aid them in these circumstances. The Local Authority also has whistleblowing procedures.

Whistleblowing regarding the Headteacher should be made to the Chair of the Governing Body, whose contact details should be readily available to staff.

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

- general advice on whistleblowing can be found at whistleblowing for employees
- the NSPCC Whistleblowing Advice Line is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – and the line is available from 08:00 to 20:00 Monday to Friday, and 09:00 to 18:00 at weekends. The email address is help@nspcc.org.uk.

28. Escalation and resolution

If any member of staff is unhappy with the response they have received in relation to a safeguarding concern they have raised, it is their responsibility to ensure they escalate their concern within the organisation. All members of staff are aware of their responsibility to escalate and refer concerns on to Children's Services when it is appropriate to do so.

Where professional disagreement occurs and the Designated Safeguarding Lead and/or Deputy are unhappy with the actions or decisions of another agency, they will escalate their concern in line with the Local Safeguarding Children Partnership's formal escalation policy to ensure a timely resolution, which can be found here: https://liverpoolscp.trixonline.co.uk/chapter/lscp-escalation-procedure

The first step of any escalation process with another agency is to raise any concerns directly with the other professional and their line manager. A professionals meeting is always a positive way of resolving differences and remaining focussed on the outcomes for the child.

29. Proactive Safeguarding

New Heights School recognises that school plays a significant part in the prevention of harm to our children by providing them with opportunities to learn, good lines of communication with trusted adults, supportive peers and an ethos of protection. As a result, safeguarding and child protection is at the heart of everything and underpins all policy and procedures within our school.

New Heights School recognises that we may provide the only stability in the lives of children who have been abused or who are at risk of harm.

New Heights School recognises that safeguarding incidents and/or behaviours can be associated with factors outside the school or can occur between children outside the school. All staff, but especially the Designated Safeguarding Lead and deputy should consider the context within which such incidents or behaviours occur. This is known as contextual safeguarding, or extra-familial harm, which means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

In order to maintain a whole school approach to safeguarding, our school community will:

- Work to establish and maintain an ethos where children feel secure and are encouraged to talk and are always listened to. This ethos will be modelled and replicated by staff and governors.
- Promote a caring, safe and positive environment within the school.
- Ensure that the school site is a safe, secure and welcoming place to learn and grow.
- Encourage self-esteem and self-assertiveness through the curriculum as well as through personal relationships, whilst not condoning aggression or bullying.
- Include regular consultation with children e.g. through safety questionnaires, participation in anti-bullying week, etc.
- Ensure that all children know there is an adult in the school whom they can approach if they are worried or in difficulty.
- Include safeguarding messages across the full curriculum, including RSHE/PSHE, to ensure that the children are equipped with the skills they need to recognise risky behaviours, stay safe from harm and to know to whom they should turn for help. In particular this will include e.g. staying safe online, anti-bullying, e-safety, road safety, pedestrian and cycle training, focused work in Year 6 to prepare for transition to Secondary school and more personal safety/independent travel, issues around consent, sexting, positive mental health, etc.
- Offer a positive school experience.
- Ensure all staff are aware of school guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks
- Ensure that all staff, volunteers, governors, policies and procedures operate with the best interests of the child at their heart.

30. Monitoring and Quality Assurance

Policies and procedures only remain effective if they are regularly monitored and reviewed to ensure that they are still applicable and relevant. Our school and its governors recognise the importance of monitoring and quality assuring the effectiveness of our child protection policy and the procedures set out within it. The aim of monitoring and evaluating the child protection policy is to learn from practical experience, which will contribute to inform policy reviews and future changes to the policy and procedures. The process of monitoring and quality assurance will help the school and governors to identify the policy strengths and weaknesses and will help to provide an understanding of the reasons for these, so that decisions can be made to resolve any limitations with immediate effect.

Monitoring and evaluation will be done by checking whether the standards from the child protection policy are implemented and whether safeguards are working and will be undertaken throughout the year by the Designated Safeguarding Lead, the Headteacher and the Chair of Governors. Activities which could form part of the ongoing monitoring of effectiveness are:

- Scrutiny of the Single Central Record and personnel files to ensure pre-employment checks are robust and up-to-date, and that job descriptions for new positions include reference to child protection, etc.

- Scrutiny of the school's annual 175 safeguarding audit by the Chair of Governors and Link Governor for Safeguarding, alongside the full governing body having oversight of any actions arising from the audit.
- Confirmation that training has been undertaken according to planned schedule and that all relevant staff and volunteers have participated
- There is effective analysis of safeguarding data including bullying, attendance, exclusions, behaviour logs, pupils taken off roll, the views and progress and participation of vulnerable students. In particular, the school will monitor the link between attendance and safeguarding and those persistently absent, frequently late, missing school (including part of the school day) or those who suddenly stop attending.
- Methods such as regular 'safeguarding training questionnaires' used to evidence the effectiveness of staff training and their understanding of Part 1 of Keeping Children Safe in Education.
- Regular meetings with staff, volunteers and children which include the opportunity to discuss safeguarding and child protection, or use of questionnaires to evidence this
- Safeguarding learning walks designed to evidence and test out key safeguarding standards
- Adapting and amending the policy and procedures outside of their annual review date to reflect current issues which may have recently arisen in order to ensure that all children are protected at all times.

New Heights School will also draw upon additional quality assurance activities and templates referenced within the SIL Schools Safeguarding Handbook e.g. Single Central Record Checklist, Personnel Record Checklist and the Headteacher's Quality Assurance Checklist.