Clennell
Education Solutions

Safeguarding and Child Protection Policy

2026-27

CHRIST'S COLLEGE, SUNDERLAND
Emmanuel Schools Foundation

Date reviewed: 07.09.26

Date ratified by the Governing Board: …….

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KEY SCHOOL CONTACT DETAILS	
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Assistant Director of Education with oversight of Safeguarding	**Hattie Curry** **hcurry@esf-mail.org.uk**
Trustees – for safeguarding	**Lead trustee for safeguarding** Martin Oldknow moldknow@esf-schools.org.uk

KEY EXTERNAL CONTACT DETAILS	
Local authority designated officer (LADO)	designatedofficer@togetherforchildren.org.uk
Children's social care	Together for Children emergency Duty Team **0191 520 5560** **0191 520 5552 (out of hours)** Safeguarding.Children@togetherforchildren.org.uk Police – 101 (in an emergency always dial 999) NSPCC Helpline – 0808 800 5000
Multi-agency safeguarding hub	Integrated Contact and Referral Team (ICRT) Sunderland Multi-Agency Child Protection a referral can be made on **0191 561 7007**. A referral form must be sent within one working day. Safeguarding.Children@togetherforchildren.org.uk
Police/law and order	Emergency: 999 Non-emergency: 101 Prevent - please refer to local multi-agency safeguarding partner arrangements Anti-Terrorist Hotline on 0800 789 321
NSPCC whistleblowing helpline (Mon-Fri 8am-8pm)	Address: Weston House, 42 Curtain Road, London EC2A 3NH Helpline: 0800 028 0285
Disclosure and barring service (DBS)	Address: PO Box 3961, Royal Wootton Bassett, SN4 4HF customerservices@dbs.gov Tel: 03000 200 190
Teacher regulation agency (TRA)	Address: Cheylesmore House, 5 Quinton Rd, Coventry CV1 2WT misconduct.teacher@education.gov.uk Tel. Teacher misconduct: 0207 593 5393
OFSTED	whistleblowing@ofsted.gov.uk Whistleblowing hotline: 0300 1233 155 (8am -6pm Mon-Fri)

This policy has regard to the following guidance and advice:

- *Keeping Children Safe in Education* (DfE 2026). Statutory guidance
- *Working Together to Safeguard Children: A guide to multi-agency working to help, protect and promote the welfare of children (*2026). Statutory guidance
- *Multi-agency statutory guidance on female genital mutilation* (HM Government, July 2020). Statutory guidance
- *Relationships Education*, *Relationships and Sex Education (RSE)* and *Health Education* guidance (DfE September 2025). Statutory guidance
- *Children Missing Education* (DfE 2024). Guidance for Local authorities
- *Statutory framework for the early years foundation stage* (DfE 2024). Statutory guidance
- *Revised Prevent duty guidance: for England and Wales* (HM Government 2023). Statutory guidance
- *Guidance (non-statutory) for safer working practice for those working with children and young people in education settings.* (Safer Recruitment Consortium February 2022)
- *What to do if you're worried a child is being abused* (HM Government March 2015). Advice for practitioners
- Information sharing: *Advice for practitioners providing safeguarding services to children, young people, parents and carers* (HM Government, May 2024)
- Local authority/safeguarding partnership advice and guidance
- Mental Health and Behaviour in Schools 2018
- *Working together to improve school attendance*
- Mobile phones in schools guide (DfE) 2026

POLICY STATEMENT

Safeguarding and promoting the welfare of children is of paramount importance and is everyone's responsibility.

It is the responsibility of *every* member of staff, volunteer and regular visitor to our school to ensure that they carry out the requirements of this policy and, at all times, work in a way that will safeguard and promote the welfare of all of the pupils at this school. This includes the responsibility to provide a safe environment in which children can learn and promote an inclusive, anti-discriminatory culture where racism, and other forms of discriminatory behaviour are recognised, challenged and addressed.

We recognise that staff within our trust play a particularly important role as they are in a position to identify concerns early and provide help for children to prevent concerns from escalating. **All staff are advised to maintain an attitude of '*it could happen here*' where safeguarding is concerned.** When concerned about the welfare of a child, staff members must always act in the **best interests** of the child.

Our trust will establish and maintain an ethos where children feel secure, are encouraged to talk, are listened to and are safe. Children will be able to talk freely to any member of staff at our school if they are worried or concerned about something.

All staff and regular visitors will, through training and induction, know how to recognise indicators of concern, how to respond to a disclosure from a child and how to record and report this information. We will not make promises to any child and we will not keep secrets. Every child will know that an adult will have to share and follow procedures with any information they have chosen to disclose.

Throughout our curriculum we will provide activities and opportunities for children to develop the skills they need to identify risks and stay safe, including online. This will also be extended to include material that will encourage our children to develop essential life skills.

At all times we will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from other agencies in line with Working Together to Safeguard Children (2026) and local multi-agency safeguarding partner procedures.

This policy is reviewed and updated annually (as a minimum) and is available on the ESF website or from the school office.

This policy applies to all staff, children, parents, governors, trustees, volunteers and visitors.

DEFINITION OF SAFEGUARDING

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 that is within or outside the home, including online
• preventing the impairment of children's mental and physical health or development
• ensuring that children grow up in circumstances consistent with the provision of safe and effective care
• taking action to enable all children to have the best outcomes.

Keeping children safe in education 2026

Child protection is part of safeguarding and promoting the welfare of children and is defined as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

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.

Working Together to Safeguard Children 2026

Abuse, neglect and exploitation

Abuse: a form of maltreatment of a child. Somebody may abuse, neglect or exploit a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a school/college, inside and outside of home, and online or in a family setting by those known to them or, more rarely, by others. Abuse, neglect and exploitation can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Abuse, neglect and exploitation
All staff will be made aware of indicators of abuse, neglect and exploitation. Knowing what to look for is vital for the early identification of abuse and neglect and specific safeguarding issues such as child criminal exploitation and child sexual exploitation so that staff are able to identify cases of children who may be in need of help or protection.

If staff are unsure, they should always speak to the designated safeguarding lead (DSL) or deputy.

Abuse, neglect and exploitation and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another, therefore staff should always be vigilant and always raise any concerns with the DSL.

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of this environment. All staff, but especially the DSL should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse - including physical, sexual, emotional abuse, and stalking), criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation.

Technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of self-generated intimate images and/or videos including those generated using AI e.g. deepfakes. especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

In all cases, if staff are unsure, they should always speak to the DSL in the relevant school.

Further information about the different kinds of abuse can be found in the appendices.

PROCEDURES FOR RESPONDING TO CONCERNS ABOUT A CHILD'S WELFARE

What staff should do if they have a concern about a child

All staff **must** report **any** concerns they have about a child and not see these as insignificant. Staff should **not** assume a colleague or another professional will take action and share the concern.
On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this policy to allow the DSL in the relevant school to build up a picture and access support for the child at the earliest opportunity.
A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

Staff **must** immediately report **any**:

- Suspicion that a child is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play, everyday or normal activities
- Explanation given which appears inconsistent or suspicious
- Behaviours which give rise to suspicions that a child may have suffered harm (e.g. worrying drawings, play, actions)
- Concerns that a child may be suffering from inadequate care, ill treatment or emotional maltreatment
- Concerns that a child is presenting signs or symptoms of abuse or neglect
- Significant changes in a child's presentation, including non-attendance
- Hint or disclosure of abuse from any person
- Concerns regarding person(s) who may pose a risk to children (e.g. living in a household with children present)

Children can sometimes show signs or act in ways they hope adults will notice and react to.
All staff should be aware of this and remain vigilant.

What staff should do if a child is in danger or at risk of harm
If staff are concerned that a child could be at risk of harm they must report to the designated safeguarding lead (DSL) or deputies (DDSL) in the relevant school immediately**.**
If this is not possible, they should make a direct referral to children's social care.

What staff should do if they have a concern about honour based abuse (HBA), including FGM and forced marriage
If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the DSL in the relevant school. As appropriate, the DSL will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.
Where FGM has taken place, there has been a **mandatory reporting duty** placed on teachers since 31st October 2015. 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 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.

Further information can be found in the Multi-agency statutory guidance on female genital mutilation and the FGM resource pack particularly section 13.

Responding to disclosure

Disclosures or information may be received from children, parents or other members of the public. School recognises that those who disclose such information may do so with difficulty, having chosen carefully to whom they will speak. Accordingly, all staff will handle disclosures with sensitivity.

Such information cannot remain confidential and staff will immediately communicate what they have been told to the DSL in the relevant school.
Staff will not investigate but will, wherever possible, elicit enough information to pass on to the DSL in order that they can make an informed decision of what to do next.

Staff will:

- Listen to and take seriously any disclosure or information that a child may be at risk of harm
- Try to ensure that the person disclosing does not have to speak to another member of school staff
- Clarify the information
- Try to keep questions to a minimum and of an 'open' nature e.g. 'Can you tell me what happened?' rather than 'Did x hit you?'
- Try not to show signs of shock, horror or surprise
- Not express feelings or judgments regarding any person alleged to have harmed the child
- Explain sensitively to the person that they have a responsibility to refer the information to the DSL
- Reassure the child that they will be taken seriously, supported and kept safe
- Listen to and take into account (wherever possible) the child's wishes and feelings about the current situation as well as future plans
- Ask any necessary questions to determine the child's wishes and feelings.
- Explain that only those who 'need to know' will be told
- Explain what will happen next and how the child will be involved (as appropriate)
- Ensure there is appropriate support made available
- Log on CPOMS for the relevant school

The DSL should be used as a first point of contact for concerns and queries regarding any safeguarding concern in our school. Any member of staff or visitor to the school who receives a disclosure of abuse or suspects that a child is at risk of harm must report it immediately to the DSL or, if unavailable, to the deputy. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff.

All concerns about a child should be reported without delay and recorded in writing using the agreed procedures (CPOMS in the relevant school).

If in doubt about recording requirements, staff **must** discuss this with the DSL.

Following receipt of any information that raises concern, the DSL will consider what action to take and seek advice from children's social care as required. All concerns, discussions and decisions made, and the reasons for those decisions will be recorded in writing.

It is **not** the responsibility of school staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on in accordance with these procedures.

All referrals will be made in line with local children's social care procedures.

The school adheres to child protection procedures that have been agreed locally through the local multi-agency safeguarding partner arrangements. Where we identify children and families in need of support, we will carry out our responsibilities in accordance with local threshold guidance.

If, at any point, there is a **risk of immediate serious harm** to a child, a referral should be made to children's social care **immediately** and **if a criminal offence has been committed contact the police.** Anybody can make a referral. If the child's situation does not appear to be improving, then the staff member with concerns should press for re-consideration by raising concerns again with the DSL and/or the Principal/Head of School in the relevant school. Concerns should always lead to help for the child at some point.

Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with children's social care, or the police if:

- The situation is an emergency and the DSL, their alternative and the headteacher are all unavailable.
- They are convinced that a direct report is the only way to ensure the child's safety.

Any member of staff, who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy, should raise their concerns with the principal or the chair of the governing board. If any member of staff does not feel the situation has been addressed appropriately at this point, then they should contact children's social care directly with their concerns.

Vulnerability

Staff should consider children who may be particularly vulnerable to abuse and may require universal services and community based early help or the targeted early help level of Family Help. This could include:

- Any child with additional needs including children with Special Educational Needs/Disabled children (SEND)
- Children facing housing issues such as frequent moves and homelessness
- Those living in families with chaotic lifestyles
- Families or children with increased stress, parental mental ill health and/or drug and alcohol misuse
- Those children living elsewhere, with friends, relatives, privately fostered, in care or are leaving care
- Asylum seekers/refugees
- Those vulnerable to discrimination on the basis of a protected characteristic
- Children living in households with domestic abuse
- Children at risk of so called 'honour'-based abuse including FGM and forced marriage
- Children with communication difficulties

- Children without adequate parenting/supervision which could lead to abuse, risk-related behaviour and exploitation.
- Children at risk of being radicalised into terrorism
- Children who identify as LGBT or questioning their gender will be provided with a safe space for them to speak out or share their concerns with members of staff.
- Children who have experienced multiple suspensions, are at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.

A child who is:

- A young carer
- Showing signs of being drawn into anti-social and/or criminal behaviour/involved in gangs
- Frequently missing from school/home/care home
- Misusing drugs or alcohol
- At risk of being radicalised
- At risk of being exploited (criminal/sexual)
- Showing signs of neglect and abuse
- At risk of modern slavery/trafficking

This is not an exhaustive list but merely an example of vulnerabilities that staff must consider when identifying safeguarding concerns.

Staff should recognise that children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination and the impact this may have. Staff should be alert to the signs and impact of prejudice-based harm and ensure that concerns are considered, reported and recorded within safeguarding practice where appropriate.

Staff should recognise that racism, faith-targeted abuse, and other forms of discriminatory behaviour may have a significant impact on a child's welfare, wellbeing and sense of safety and should be considered within safeguarding practice where appropriate.

We are alert to the needs of young carers, recognising that caring responsibilities can impact on their attendance, attainment, behaviour and wellbeing. Early identification is essential to ensure young carers receive support, at the right time and by the appropriate services including additional support from external partners, or local authority and health services.

Children in Alternative Provision

School is responsible for the safeguarding of pupils placed in Alternative Provision. This will include but is not limited to:

- Obtaining written confirmation that the AP has conducted appropriate safeguarding checks on all staff.
- Reviewing the AP placement at least every half-term to confirm the child's attendance and safety.

- Always knowing where a child is based during school hours. This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend.
- Where safeguarding concerns arise, the placement should be immediately reviewed, and terminated, if necessary, or until those concerns have been satisfactorily addressed.

Community based Early Help assessment

Staff will be alert to the need of supporting pupils through universal services and community based early help and the targeted early help level of Family Help if required. This will occur as soon as a problem emerges at any point in a child's life. If an early help assessment is appropriate, the DSL (or deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment, as appropriate.

Staff may be required to support other agencies and professionals in an early help assessment and, in some cases, where education is the fundamental factor, act as the lead practitioner.

Early help assessments should be kept under review and referred to children's social care for assessment if the child's situation does not appear to be improving or is getting worse.

The DSL will follow the assessment process for the child's residing local authority to ensure provision of family help and children's social care services. This will include following local criteria for action and local authority children's social care referral arrangements.

Statutory children's social care assessments and services

Concerns about a child's welfare will be referred to the local authority children's social care by the DSL. **Where a child is suffering, or is likely to suffer from harm, a referral to children's social care (and if appropriate the police) will be made immediately.**
Referrals will follow the local authority referral process.

The DSL should be aware of the requirement for children to have an appropriate adult while a child is being questioned by the police. The appropriate adult will "support, advise and assist" the young person, and also "observe whether police are acting properly and fairly to respect [the young person's] rights and entitlements, and inform the officer of the rank of inspector or above if they consider that they are not". Further information can be found in the statutory guidance – PACE Code C 2023.

Where a child in school has a Child in Need plan or a Child Protection plan, the school will liaise with children's social care, attend meetings and provide comprehensive and detailed reports.

All reports for Child in Need/Child Protection conferences will be prepared in advance, using the guidance and report template. The information contained in the report will be shared with parents before the conference as appropriate. In order to complete such reports, all relevant information will be sought from staff working with the child in school. All staff should be prepared to contribute to the report writing process.

CHILD ON CHILD ABUSE (INCLUDING HARASSMENT AND VIOLENCE)

Children can abuse other children and this can take many forms, including physical, emotional, online, prejudice-based harm, relationship abuse, and harmful sexual behaviour. It can happen both inside and outside of school, online and face to face. There may also be reports where the children concerned attend two or more different schools.

Child on child abuse will not be tolerated. All staff will take a zero tolerance approach to any abusive behaviours and will stop and challenge inappropriate behaviours between children, many of which may be sexual in nature. We recognise that even if there are no reported cases of child on child abuse that such abuse may still be taking place and all staff should be vigilant.

A difficult feature of child on child abuse is that the perpetrators could be victims themselves and possibly are being abused by other family members, other adults and children.

In cases where child on child abuse is identified we will follow our procedures for dealing with concerns, recognising that both the victim and perpetrator will require support.

The school takes the following steps to minimise the risk of child on child abuse:

- Promoting an open and honest environment where children feel safe and confident to share their concerns and worries
- Using the Relationship, Sex and Health Education and PSHE to educate and reinforce our messages through stories, role play etc.
- Ensuring school is well supervised, especially in areas where children may be vulnerable or have identified they are vulnerable
- Ensures staff are aware of the indicators and signs of child on child abuse and how to identify them
- Addresses inappropriate behaviour (even if it appears to be relatively minor)
- Has clear robust policies on dealing with key issues of behaviour such as cyber bullying
- Ensures staff and children are aware of the policies
- Ensures robust supervision and be aware of potential risky areas in the school
- Increases supervision during key times
- Takes steps to prevent isolation
- Separates children if needed
- Where risk is identified, an individual child risk assessment is put in place, reviewed and updated appropriately

A selection of the following systems are in place across the Trust to enable children to confidently report any abuse: (Please see the school-specific policies for details of this)

- All children know who they can report to in school
- Assemblies signposting children to key actions/people
- Posters around school
- Listening weeks
- Report a concern link on website
- Informal/formal check ins with identified pupils

Each alleged incident will be recorded, investigated and dealt with on an individual basis based on the following principles:

- All information will be recorded in writing using the agreed procedures (as per school policies)
- All children involved (victim/s and alleged perpetrator/s) in school will be spoken to separately by the DSL
- Where the incident also involves a child at a different establishment the DSL will ensure effective liaison and information sharing
- All children involved (victim and alleged perpetrator) will be appropriately supported throughout the process
- The DSL will balance the child's wishes against their duty to protect the child and other children
- The school will work with our local multi-agency safeguarding partner arrangements where appropriate
- The DSL may need to go against the victim's wishes and make a referral to children's social care or the police. This will be handled sensitively, the reasons explained to the victim and appropriate support made available
- Parents will be informed of the incident and how their child will be dealt with and supported (unless this would put a child at greater risk)

Victims, perpetrators and any other children affected by child on child abuse will be supported in the following ways:

- Support will be tailored on a case-by-case basis
- All children involved will be supported by an allocated member of staff
- The needs and wishes of the victim will be taken into account, along with protecting the child.
- Wherever possible, the victim and witnesses will be able to continue their normal routine.
- The victim will never be made to feel they are the problem for making a report or made to feel ashamed for making a report
- All reasonable steps will be taken to protect the anonymity of any children involved in any report of sexual violence or sexual harassment
- Adequate measures will be put in place to protect the children involved and keep them safe
- A needs and risk assessment will be made and a safety plan put in place when required which will be reviewed and adapted where necessary
- Early help assessment, children's social care and other agencies will support where appropriate

Research tells us girls are more frequently identified as being abused by other children, and girls are more likely to experience unwanted sexual touching in schools. Boys are less likely to report intimate relationship abuse. Boys report high levels of victimisation in areas where they are affected by gangs. There is an increasing evidence base emerging about the sexual exploitation of boys (both by adults and children). We recognise that both boys and girls experience child on child abuse but can do so in different ways. We recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported.

We recognise that child on child abuse can manifest itself in many ways such as:

- Child Sexual Exploitation/Child Criminal Exploitation

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice-based incidents
- Physical abuse
- Radicalisation
- Abuse in intimate friendships/relationships
- Sexual violence and sexual harassment
- Violence, including the use of weapons and harassment
- Gang associated and serious violence
- Initiation/hazing type violence and rituals
- Consensual and non-consensual making or sharing of nudes and semi-nudes, including those generated using AI e.g. 'deepfakes' or 'deep nudes'
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Upskirting (which is a criminal offence)

There are a number of factors that make children more vulnerable to child on child abuse:

- Experience of abuse within their family
- Living with domestic violence
- Young people in care
- Children who go missing
- Children with additional needs (including SEND)

Some of the reasons why children abuse other children:

- The child may have been emotionally, physically, or sexually abused themselves
- The child may have witnessed physical or emotional abuse
- The child may have viewed sexually explicit/violent movies, video games or other materials
- The child may have just acted impulsively without intending to harm

Relationship abuse is unacceptable behaviour between any two people.

THE USE OF REASONABLE FORCE

There are limited circumstances when it is appropriate for staff to use 'reasonable force' to safeguard children. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a child needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is necessary for the least amount of time', the application of which will depend on the circumstances.

The decision on whether or not to use 'reasonable force' to control or restrain a child is down to the professional judgement of the staff concerned within the context of the law and should always

depend on individual circumstances. Advice on how to make this assessment is provided in the Restrictive interventions, including use of reasonable force in school's guidance.

When using 'reasonable force' in response to risks presented by incidents involving children with SEND, mental health problems or with medical conditions, staff should, in considering the risks carefully, recognise the additional vulnerability of these groups.

The Trust policy is linked here: ESF - Trust - ESF Use of Reasonable Force Searching Screening and Confiscation Policy.pdf - All Documents

MOBILES PHONES

The Department for Education (DfE) expects schools to implement a policy whereby pupils do not have access to their mobile phone or other smart technology (such as watches/glasses) throughout the school day including during lessons, the time between lessons, breaktimes and lunchtime.

Mobile phones are not permitted in any ESF school. All staff will consistently enforce the trust's policy on the use of mobile phones.

CONSENSUAL AND NON-CONSENSUAL SHARING OF NUDES AND SEMI-NUDES INCLUDING THOSE GENERATED USING AI

The term nudes and semi-nudes 'and/or videos including those generated using AI e.g. deepfakes' is used to mean the sending or posting of nude or semi-nude images, videos or live streams by children under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's Airdrop which works offline.
The term 'nudes' is used as it is most commonly recognised by children and more appropriately covers all types of image sharing incidents.

The motivations for taking and sharing nudes and semi-nudes and/or videos including those generated using AI e.g. deepfakes, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by children who are in relationships, as well as between those who are not in a relationship. It is also possible for a child in a consensual relationship to be coerced into sharing an image with their partner.

Incidents may also occur where:

- Children find nudes and semi-nudes online and share them claiming to be from another child
- Children digitally manipulate using AI, an image of a child into an existing nude online
- Images created or shared are used to abuse other children e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

The sharing of images or videos can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts.
Nudes and semi-nude images and/or videos including those generated using AI e.g. deepfakes and live streams may include more than one child.

Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents involving children complex. There are also a range of risks which need careful management from those working in education settings.

Many professionals may refer to 'nudes and semi-nudes' as:

- Youth produced sexual imagery or 'youth involved' sexual imagery. This is the legal term used to define nude or semi-nude images and videos of children under the age of 18.
- 'Sexting'. Many adults may use this term, however some children interpret sexting as 'writing and sharing explicit messages with people they know' rather than sharing images.
- Image-based sexual abuse. This term may be used when referring to the non-consensual sharing of nudes and semi-nudes.

Initial response

When an incident involving nudes and semi-nudes comes to the attention of any member of staff:

- **Confiscate the phone and switch it to 'flight mode' – if possible.**
- The incident should be referred to the DSL (or deputy) as soon as possible with the phone.
- The DSL will hold an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.
- There will be subsequent interviews with the children involved (if appropriate).
- Parents and carers will be informed at an early stage and involved in the process in order to best support the child unless there is good reason to believe that involving them would put the child at risk of harm.
- A referral will be made to children's social care and/or the police immediately if there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process.

A disclosure may not be a single event and the child may share further information at a later stage.

Any direct disclosure by a child should be taken seriously. A child who discloses they are the subject of an incident of sharing nudes and semi-nudes is likely to be embarrassed and worried about the consequences. It is likely that disclosure in school is a last resort and they may have already tried to resolve the issue themselves.

Initial review meeting

The initial review meeting will consider the initial evidence and aim to establish:

- Whether there is an immediate risk to any child
- If a referral should be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the child – **in most cases, images or videos should not be viewed**
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms as this may be unknown
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the children involved which would influence risk assessment
- If there is a need to contact another education, setting or individual

- Whether to contact parents or carers of the children involved - in most cases they should be involved

An immediate referral to police and/or children's social care through the MASH (multi-agency safeguarding hub) or equivalent will be made if at this initial stage:

- The incident involves an adult.
- There is reason to believe that a child has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs).
- What you know about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent.
- The images involve sexual acts and any child in the images or videos is under 13.
- You have reason to believe a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming.

The DSL should be aware of the requirement for children to have an appropriate adult while a child is being questioned by the police. The appropriate adult will "support, advise and assist" the child, and also "observe whether police are acting properly and fairly to respect [the child's] rights and entitlements, and inform the officer of the rank of inspector or above if they consider that they are not". Further information can be found in the statutory guidance – PACE Code C 2023.

If none of the above apply, the DSL may decide to respond to the incident without involving the police or children's social care. They can still choose to escalate the incident at any time if further information/concerns are disclosed at a later date.

The decision to respond to the incident without involving the police or children's social care will only be made in cases where the DSL is confident that they have enough information to assess the risks to any child involved and the risks can be managed within the school's support and disciplinary framework and, if appropriate, their local network of support.

Assessing the risks

The circumstances of incidents can vary widely. If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL (or equivalent) should conduct a further review (including an interview with any child involved) to establish the facts and assess the risks.

When assessing the risks and determining whether a referral is needed, the following should be also considered:

- Why was the nude or semi-nude shared? Was it consensual or was the child put under pressure or coerced?
- Has the nude or semi-nude been shared beyond its intended recipient? Was it shared without the consent of the child who produced the image?
- Has the nude or semi-nude been shared on social media or anywhere else online? If so, what steps have been taken to contain the spread?
- How old are any of the children involved?
- Did the child send the nude or semi-nude to more than one person?
- Do you have any concerns about the child's vulnerability?
- Are there additional concerns if the parents or carers are informed?

The DSL will decide whether a child is at risk of harm, in which case a referral will be appropriate, whether additional information or support is needed from other agencies or whether the education setting can manage the incident and support any child or young person directly. The DSL will always use their professional judgement in conjunction with that of their colleagues to assess incidents.

Supporting the child involved

The DSL or another member of staff (who the child feels more comfortable talking to) will discuss future actions and support with the child. This discussion will take into account the views of the child as well as balancing what are considered to be appropriate actions for responding to the incident.

The purpose of the discussion is to:

- Identify, **without viewing wherever possible**, what the image contains and whether anyone else has been involved.
- Find out whether the image has been shared between two people or shared further. This may be speculative information as images or videos may have been shared more widely than the child or young person is aware of.
- Discuss what actions and support might be needed, including preventing further distribution.

When discussing the sharing of nudes and semi-nudes, the DSL/member of staff will:

- Reassure the child that they are not alone, and the school will do everything that they can to help and support them. They should also be reassured that they will be kept informed throughout the process.
- Recognise the pressures that children can be under to take part in sharing an image and, if relevant, support their parents and carers to understand the wider issues and motivations around this.
- Remain solution-focused and avoid any victim-blaming questions such as 'why have you done this?' as this may prevent the child from talking about what has happened. For example, they will use questions such as 'describe what happened' or 'explain to me who was involved'.
- Help the child to understand what has happened by discussing the wider pressures that they may face and the motivations of the person that sent on the image(s).
- Discuss issues of consent and trust within healthy relationships. Explain that it is not ok for someone to make them feel uncomfortable, to pressure them into doing things that they do not want to do, or to show them things that they are unhappy about. Let them know that they can speak to the DSL or equivalent if this ever happens.
- Explain the law on the sharing of nudes and semi-nudes. It is important to highlight that the law is in place to protect children and young people rather than criminalise them and should be explained in such a way that avoids alarming or distressing them
- Signpost them to the IWF (Internet Watch Foundation) and Childline's Report Remove tool. Report Remove helps children and young people to report an image shared online, to see if it is possible to get the image removed. This must be done as soon as possible in order to minimise the number of people that have seen the picture.

Informing parents and carers

Parents or carers will be informed and involved in the process at an early stage unless informing them will put a child or young person at risk of harm. Any decision not to inform the parents or carers will be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when they should be informed.

Supporting parents and carers
Children and young people can be involved in an incident in several different ways. They may lose control of their own image, receive an image of someone else or share an image of another person. In any of these situations, parents and carers may find it difficult to know how to deal with the knowledge that their child has been involved in an incident and may display differing emotions.
Whatever their feelings, it is important that we listen to their concerns and take them seriously. We will also help to reassure parents and carers by explaining that it is normal for young people to be curious about sex.

In all situations, parents or carers will be:

- Given information about the sharing of nudes and semi-nudes, what they can expect to happen next, and who will be their link person within the school.
- Given support to deal with their own feelings of upset and concern including signposting to further resources that can help them to understand the sharing of nudes and semi-nudes or support services they can contact, where appropriate.
- Given support on how to speak to their child about the incident.
- Advised on the law around the sharing of nudes and semi-nudes.
- Kept updated about any actions that have been taken or any support that their child is accessing, unless the child involved has specifically asked for this not to happen and is judged to be old enough to make that informed decision.
- Informed about sources of support for their child, in case they are feeling anxious or depressed about what has happened. This could include speaking to a Childline. counsellor online or on 0800 11 11, or a GP. If they are concerned that their child is suicidal, they should contact 999.
- Directed to NCA-CEOP if the child discloses any further details to them that may suggest they are being groomed or sexually exploited.

Searching devices, viewing and deleting nudes and semi-nudes, images and/or videos including those generated using AI e.g. deepfakes Staff and parents or carers must not intentionally view any nudes and semi-nudes unless there is a good and clear reason to do so as outlined below.
Wherever possible, responses to incidents will be based on what DSLs have been told about the content of the imagery.
The decision to view any imagery will be based on the professional judgement of the DSL. Imagery will never be viewed if the act of viewing will cause significant distress or harm to any child or young person involved.
If a decision is made to view imagery, the DSL would need to be satisfied that viewing is:

- The only way to make a decision about whether to involve other agencies is because it is not possible to establish the facts from any child involved.
- Necessary to report it to a website, app or suitable reporting agency (such as the IWF) to have it taken down, or to support the child or parent or carer in making a report.
- Unavoidable because a child has presented it directly to a staff member or nudes or semi-nudes have been found on an education setting's device or network.

If it is necessary to view the imagery, then the DSL will:

- Never copy, print, share, store or save them; this is illegal. If this has already happened, we will contact the local police for advice and to explain the circumstances.
- Discuss the decision with the headteacher or a member of the senior leadership team.

- Ensure viewing is undertaken by the DSL or another member of the safeguarding team with delegated authority from the headteacher or a member of the senior leadership team.
- Ensure viewing takes place with another member of staff present in the room, ideally the headteacher or a member of the senior leadership team. This staff member does not need to view the images.
- Wherever possible, make sure viewing takes place on the school premises, ideally in the headteacher or a member of the senior leadership team's office.
- Ensure wherever possible that they are viewed by a staff member of the same sex as the child or young person in the images.
- Record how and why the decision was made to view the imagery in the safeguarding or child protection records, including who was present, why the nudes or semi-nudes were viewed and any subsequent actions. This will be signed and dated.
- If any devices need to be taken and passed onto the police, the device(s) will be confiscated and the police will be called. The device will be disconnected from Wi-Fi and data, and turned off immediately (airplane mode) to avoid imagery being removed from the device remotely through a cloud storage service. The device will be placed in a secure place, in a locked cupboard until the police are able to come and collect it.

If nudes and semi-nudes and/or videos including those generated using AI e.g. deepfakes have been viewed by a member of staff, either following a disclosure from a child or young person or as a result of a member of staff undertaking their daily role (such as IT staff monitoring school systems), the DSL will make sure that the staff member is provided with appropriate support. Viewing nudes and semi-nudes can be distressing for both children and adults and appropriate emotional support may be required.

In most cases, children and young people will be asked to delete the imagery and to confirm that they have deleted them. They will be given a deadline for deletion across all devices, online storage or social media sites. They will be reminded that possession of nudes and semi-nudes is illegal. They will be informed that if they refuse or it is later discovered they did not delete the imagery, they are continuing to commit a criminal offence and the police may become involved.

All incidents relating to nudes and semi-nudes being shared will be recorded using the school's procedures. Copies of imagery should not be taken or stored.

It is important that children and young people understand the school's policy towards nudes and semi-nudes. The content of this policy and the protocols the school will follow in the event of an incident will be explored as part of teaching and learning. This will reinforce the inappropriate nature of abusive behaviours and reassure children that school will support them if they experience difficulties or have concerns.
Any occasion where a child needs to be searched to find an image or a device storing an image, searches will take place inline with school policy and DfE Searching Screening and Confiscation Advice.

For more information: Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK (www.gov.uk)

CYBERCRIME

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

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

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that **Cyber Choices** does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: NCA Cyber choices, NPCC- When to call the police and The National Cyber Security Centre

CHILDREN WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES OR MEDICAL CONDITIONS

Children with Special Educational Needs or Disabilities (SEND) or certain health conditions can face additional safeguarding challenges. Children with SEND are significantly more likely to be abused than their peers.

Additional barriers can sometimes exist when recognising abuse in SEND children. These 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 disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs
- Communication barriers and difficulties overcoming these barriers

Staff will support these children in expressing any concerns they may have and will be particularly vigilant to any signs or symptoms of abuse. The DSL and SENDCO will work together when dealing with reports of abuse involving children with SEND.

A child having a medical condition (including allergies and conditions requiring delegated healthcare tasks) is not in itself an indicator that a child is at greater safeguarding risk. In the event of a clinical incident taking place in a school or college, the responsible healthcare professional, in conjunction with the DSL should consider whether any safeguarding duty has been triggered and whether any further action is required based on the nature of the incident. Further information is provided in our statutory guidance on Supporting pupils with medical conditions at school.

MENTAL HEALTH CONCERNS

All staff should 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 or a safeguarding concern. **Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem**. School staff, however, 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. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following our child protection policy, and staff MUST speak to the designated safeguarding lead or a deputy in the relevant school.

We will ensure that our staff understand the support they can provide to pupils who may be experiencing mental health concerns. We recognise that early intervention to identify issues and provide effective support is crucial. The school role in supporting and promoting mental health and wellbeing can be summarised as:

Prevention: We will seek to create a safe and calm environment where mental health problems are less likely, improving the mental health and wellbeing of the whole school population, and equipping pupils to be resilient so that they can manage the normal stress of life effectively. This will include teaching pupils about mental wellbeing through the curriculum and reinforcing this teaching through school activities and ethos;

Identification: We will support staff and pupils to recognise emerging issues as early and accurately as possible.

Early support: We will support and help pupils to access evidence based early support and interventions wherever possible and seek access to specialist support for those pupils who require such interventions.
We aim to work in partnership with pupils, parents/carers and establish effective relationships with external agencies to provide swift access or referrals to specialist support and treatment.

The NHS Every Mind Matters website also contains helpful information and advice about looking after a child's mental health:

https://www.nhs.uk/every-mind-matters/supporting-others/childrens-mental-health/

CONTEXTUAL SAFEGUARDING

Safeguarding incidents and/or behaviours can be associated with factors outside school or college and/or can occur between children outside the school or college. All staff should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply 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.
Please see school-specific policies for detail of contextual safeguarding issues.

Geographical factors
Social, economic and political factors
Peer group factors
Home factors

RECORDING, RECORD KEEPING AND INFORMATION SHARING

All concerns, discussions and decisions made, and the reasons for those decisions, will be recorded in on the relevant CPOMS system.
Each record should include:

- A clear and comprehensive summary of the concern
- A list of any actions taken immediately in response to the incident or concern
- Details of how the concern is to be/was followed up and resolved
- A note of each action taken, decisions reached and the outcome
- Information from a child written verbatim
- Date and signature/record of who completed the record

If there is any doubt about recording requirements, staff should discuss with the DSL in the relevant school.

All concerns should be passed to the DSL or deputy within their absence **without delay,** either written or verbal (followed as soon as possible by a written report)

Please see school-specific policies for details of how Child Protection information is stored, secured and accessed.
Only Child Protection information will be kept in the file and this file will be kept up to date. Records of concern, copies of referrals, invitations to Child Protection conferences, core groups and reports will be stored here. All Child Protection files will include; a chronology, a contents front cover and will record significant events in the child's life.

Child Protection files will be the responsibility of the DSL. Child Protection information will only be shared with relevant staff/agencies on a 'need to know' basis, in the child's interests and on the understanding that it remains strictly confidential.

When a child leaves our school, the DSL will make contact with the DSL at the new school and will ensure that the child protection file is forwarded to the receiving school in an agreed secure manner.

This should be as soon as possible and within 5 days for an in-year transfer or within the first 5 days at the start of a new term to allow a school or college to have support in place for when a child arrives. We will retain evidence to demonstrate we have acted accordingly when dealing with safeguarding matters and how the file has been transferred; this will be in the form of electronic records via CPOMS audit features. Where child protection files are electronic the DSL will speak with the DSL of the receiving school and ensure they are aware of the protection concerns.
Where a parent elects to remove their child from the school roll to home educate, the school will make arrangements to pass any safeguarding concerns to the Local Authority.

PROCEDURES FOR HANDLING CONCERNS ABOUT STAFF OR VOLUNTEERS

What staff should do if they have safeguarding concerns about another member of staff

If staff have safeguarding concerns or an allegation of abuse is made about another member of staff (including supply staff, volunteers and contractors) posing a risk of harm to children this should be reported to the Principal in the relevant school, including low level concerns. Where there are concerns about the Principal this should be referred to the Director of HR.

What staff should do if they have concerns about safeguarding practices within the school

Each school will maintain a safeguarding culture which encourages all staff and volunteers to feel able to raise concerns. Where staff have concerns about poor or unsafe practice and potential failures in a school's safeguarding systems, these should be raised following the trust's whistleblowing policy ESF - Trust - ESF Whistleblowing Policy.pdf - All Documents.

Where a staff member feels unable to raise an issue with the school, or feels their genuine concerns are not being addressed, other whistleblowing channels are available, such as the NSPCC whistleblowing advice line. Contact details are on the Key External Contacts page.

MANAGING SAFEGUARDING CONCERNS AND ALLEGATIONS MADE AGAINST STAFF, VOLUNTEERS AND CONTRACTORS

Allegations that meet the harms threshold

All allegations will be investigated thoroughly and as a matter of urgency. They will be dealt with quickly, fairly and consistently. Protection will be provided for the child and the person subject to the allegation will be supported.

We will always ensure that the procedures outlined in the local authority arrangements for managing allegations and Part 4 of *'Keeping Children Safe in Education'*, DfE are adhered to and where appropriate, we will seek advice from the LADO.

Allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in school would apply when staff (including volunteers and supply staff) have (or alleged to have):

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;

- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The last bullet point includes behaviour that may have happened outside of school, that might make an individual unsuitable to work with children, this is known as transferable risk.
Where appropriate, an assessment of transferable risk to children with whom the person works will be undertaken. If in doubt we will seek advice from the LADO.

When an allegation is made against an adult that meets the above criteria it should be reported immediately to the Principal who is the 'case manager'. This includes allegations made against agency and supply staff, volunteers and contractors.
Should an allegation be made against the Principal, this will be reported to the Director of HR.
In the event that neither the Principal nor Director of HR is contactable on that day, the information must be passed to and dealt with by either the member of staff acting as Principal, the chair of the governing board or the LADO.

The case manager will conduct basic enquiries in line with local procedures and KCSIE to establish the facts to help determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion involving the police and/or children's social care will be convened. Cases of suspected abuse will be referred to children's social care.
The case manager will immediately discuss with the LADO, the nature, content and context of the allegation and agree on a course of action. Where the case manager deems there to be an immediate risk to children or a criminal offence has been committed, the police will be contacted immediately. All discussions, agreed actions and communications will be recorded in writing.

If the initial discussion leads to no further action, the case manager and the LADO will record the decision and justification for it and agree on what information should be put in writing to the individual concerned.

The case manager will ensure that the individual who is subject to the allegation is informed as soon as possible explaining the likely course of action guided by the LADO, and the police where necessary. The case manager will appoint a named representative to keep the person informed about the progress of the case and consider any appropriate support.

The case manager will ensure that parents of the child or children involved are formally told about the allegation as soon as possible and kept informed of the progress of the case, only in relation to their child. They will be made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in schools whilst investigations are in progress.

The case manager will monitor the progress of the case to ensure that it is dealt with as quickly as possible in a thorough and fair process.

The case manager will carefully consider whether the circumstances warrant suspension from contact with children at the school, or until the allegation is resolved. It will be considered only in cases where there is cause to suspect a child or other children at the school is/are at risk of harm, or the case is so serious it might be grounds for dismissal. The case manager will seek views from HR and the LADO, as well as the police and children's social care where they have been involved. Where an individual is suspended they will be provided with a named contact in school.

The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service (DBS) and/or the Teaching Regulation Agency (TRA) should be made where an allegation is substantiated and the person is dismissed or the school ceases to use their services, or resigns or otherwise ceases to provide their services.
The school has a legal obligation to make a referral to the DBS for consideration of whether inclusion on the barred lists is required; where it considers an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person poses a risk to a child.
In the case of a member of teaching staff, the case manager must consider making a referral to the TRA to consider prohibiting the individual from teaching.

If an allegation is made against a supply teacher, agency worker or contractor, the Principal will liaise closely with the agency involved. The Principal will ensure that any allegations are dealt with following the school's procedures and in liaison with the LADO.

If an allegation is made against a governor, the Principal will follow local authority arrangements for managing allegations, liaising with the LADO.

Details of allegations following an investigation that are found to have been malicious or false will be removed from personnel records, unless the individual gives their consent for retention of the information. For all other allegations a written record of details of the investigation and the outcome will be retained in the individual's personnel file in line with KCSIE and a copy provided to the individual.

In cases where allegations are proven to be unsubstantiated, unfounded, false or malicious the LADO and case manager will consider whether the person who made the allegation is in need of help or may have been abused by someone else and this is a cry for help. A referral to children's social services may be deemed appropriate.
Allegations proven to be unsubstantiated, unfounded, false or malicious will not be included in employer references.

If an allegation is shown to be deliberately invented or malicious, the Principal will consider whether disciplinary action should be taken against a child, or whether the police should be asked to consider action against an adult.

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

Throughout the process of handling allegations and at the conclusion of a case in which the allegation is substantiated, the case manager and the LADO will review the case to determine whether there are any improvements to be made to the school's procedures or practices to help prevent similar events in the future. This should include issues arising from any decision to suspend

the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The case manager and the LADO will consider how future investigations of a similar nature could be carried out without suspending the individual.

Allegations against a teacher who is no longer teaching should be referred to the police. Non recent allegations of abuse should be reported to the LADO who will liaise with other agencies. Abuse can be reported no matter how long ago it happened.

Low-level concerns
All concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) will be dealt with promptly and appropriately.

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the criteria indicated in the allegations section above.
A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a nagging doubt.
An adult working in or on behalf of the school may have acted in a way that does not meet the expectation in the staff code of conduct, including conduct outside of school and does not meet the allegations criteria or is not considered serious enough to refer to the LADO.

Such behaviour can exist on a wide spectrum; examples could include, but are not limited to:

- Being over friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Using inappropriate language or tone

Low-level concerns about a member of staff should be reported immediately to the Principal, the Principal should ultimately be informed and make any final decisions on how to respond. Where it is about the Principal it should be reported to the Director of HR.

Low-level concerns about a supply teacher or contractor should be reported as above.
The Principal will notify the employer so that any patterns of inappropriate behaviour can be identified.

All low-level concerns will be recorded by the Principal and stored securely and confidentially.
These records will be reviewed so that any patterns of inappropriate behaviour can be identified and dealt with

SAFER WORKING PRACTICE

All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children. They should adopt high standards of personal conduct in order to maintain confidence and respect of the general public and those with whom they work.

All staff will be provided with a copy of our school's Code of Conduct at induction which sets out the school's expectations of staff behaviour. We will review our Code of Conduct regularly and ask staff to ensure that they are familiar with the current version. Staff are expected to carry out their duties in accordance with the Code of Conduct.

There will be occasions when some form of physical contact is inevitable, for example if a child has an accident or is hurt or is in a situation of danger to themselves or others around them. However, at all times the agreed policy for positive handling must be adhered to.

If staff, visitors, volunteers or parent helpers are working with children alone they must ensure they are visible to other members of staff. They will be expected to inform another member of staff of their whereabouts in school, who they are with and for how long. Doors, ideally, should have a clear glass panel in them and be left open.

Staff are responsible for their own actions and behaviour and should avoid any conduct in school and outside of school, online and offline, which would lead any reasonable person to question their motivation and intentions.

Further advice can be found in 'Guidance for safer working practices for adults who work with children and young people in education settings' (Feb 2022)
All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

SAFER RECRUITMENT

We will ensure that the headteacher and at least one member of the governing board have completed appropriate safer recruitment training. At all times the Principal and governing board will ensure that safer recruitment practices are followed in accordance with the requirements of *'Keeping Children Safe in Education'*, DfE.

The school will follow the recruitment and selection procedures when making decisions about the suitability of prospective employees. This will include: conducting the relevant checks, the school may carry out a search via an online search engine as part of due diligence on shortlisted candidates this may help identify any incidents or issues that have happened, and are publicly available online, which the school or college might want to explore with the applicant at interview, obtaining appropriate references and information from interviews.

Where staff work in EYFS or wraparound care for children under the age of 8, we will ensure the appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification Regulations 2018.
Volunteers in EYFS will not be permitted to begin working until the school has received the volunteer's enhanced DBS certificate including barred list information.

Each school will maintain a Single Central Record of all safer recruitment checks carried out in line with statutory requirements. This will include all staff, governors or volunteers who work in regulated activity and any other third parties such as sports coaches etc. This is in line with the Crime and Policing Act 2026 and KCSIE, which removes the supervision exemption from guidance around regulated activity. This means that work carried out in specified places by supervised staff or volunteers now falls under regulated activity.

We will continue to be vigilant in school and encourage staff to discuss matters both within, and where it is appropriate, outside of the workplace, which may have implications for the safeguarding of children.

Visitors
The school has clear protocols for visitors to ensure they are suitable and supervised as appropriate.

All visitors will be expected to confirm they have an appropriate DBS (if required) and will be asked to show photo ID on arrival. The school will keep a record of all visitors.

Visitors will be expected to understand that the school promotes British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and that they will need to uphold these during their visit.
For some visits, the school will request a copy of the material to be used to assess its content and relevance to the age group.
If during the visit the supervising member of staff deems the content to be inappropriate they will stop the visitor and discuss an alternative approach.

During the visit, visitors will be supervised by a member of school staff. Where the visitor will be working on a one-to-one basis with a child, specific safeguarding arrangements will be put in place.

MANAGING SAFEGUARDING

The Governing Board

The Governing Board in each school is accountable for ensuring the effectiveness of this policy and our compliance with it. Although each Governing Board takes collective responsibility to safeguard and promote the welfare of our pupils, each school also has a named Governor who champions safeguarding within the school.

Governing boards and proprietors will ensure that all Governors and Trustees receive appropriate safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective. The training will be regularly updated.

The Governing Board will ensure that:

- The safeguarding policy is in place and is reviewed annually, is available publicly via our school website and has been written in line with local authority guidance and the requirements of the local multi-agency safeguarding partner policies and procedures.
- The school contributes to inter-agency working in line with Working Together to Safeguard Children (2026).
- The school is compliant with online safety legislation by regularly reviewing the effectiveness of school filters and monitoring systems. They should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.
- They uphold the obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements. Including, not unlawfully discriminating against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).
- A senior member of staff from the leadership team is designated to take the lead responsibility for safeguarding and child protection and that there is a deputy DSL(s) who is appropriately trained to deal with any issues in the absence of the DSL. There will always be cover for this role in line with the criteria set out in Annex B of KCSIE 2026
- All staff receive a safeguarding induction and are provided with a copy of this policy and the staff code of conduct.
- All staff undertake appropriate child protection training that is updated regularly, at least annually.
- Procedures are in place for dealing with allegations against members of staff, trainee teachers, volunteers and contractors, in line with statutory guidance.
- Safer recruitment practices are followed in accordance with the requirements of *'Keeping Children Safe in Education'* DfE.
- Governors remedy without delay any weakness in regard to our safeguarding arrangements that are brought to their attention.
- Appropriate arrangements are in place to keep children safe when organisations or individuals rent or hire school facilities/premises. Safeguarding requirements will be included in any hire or lease agreement as a condition of use of the premises.

The Governing Board will receive safeguarding reports (at least annually) that will detail the training that has taken place and will inform the Governing Board how the school meets its statutory requirements.

The Governing Board will undertake a range of safeguarding visits over the year to monitor safeguarding compliance.

The Principal is responsible for:

- Identifying a senior member of staff from the leadership team to be the designated safeguarding lead (DSL).
- Identifying members of staff to act as the DSL in his/her absence to ensure there is always cover for the role.
- During term time the designated safeguarding lead (or a deputy) should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns, this may be via phone or other media as needed.
- Ensuring that the policies and procedures adopted by the governing board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff.
- Ensuring that all staff and volunteers feel able to raise concerns about poor or unsafe practice and such concerns are addressed sensitively in accordance with agreed whistle-blowing procedures.
- Liaise with the local authority designated officer (LADO) in the event of an allegation of abuse being made against a member of staff.

The virtual school headteacher

- Guidance has been updated to reflect the extension of the role of the virtual school head to include a non-statutory responsibility for oversight of the attendance, attainment, and progress of children with a social worker and those with kinship care arrangements.
- Virtual school heads should identify and engage with key professionals to help them understand the role they have in improving outcomes for children.

The designated safeguarding lead (DSL)

The DSL is a senior member of staff, from the leadership team who takes lead responsibility for safeguarding and child protection within our school. The DSL will carry out their role in accordance with the responsibilities outlined in Annex B of *'Keeping Children Safe in Education'* DfE.

The DSL will provide advice and support to other staff on child welfare and child protection matters. Any concern for a child's safety or welfare will be recorded on CPOMS and given to the DSL.

During term time the DSL and/or a deputy will always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. If in *exceptional* circumstances, a DSL/deputy DSL is not available on the school site in person, we will ensure that they are available via telephone and any other relevant media.

The DSL will manage referrals and will refer cases of suspected abuse to children's social care and refer cases to the Channel programme if there is a radicalisation concern.

The DSL will liaise with the three safeguarding partners and other agencies where necessary. Through regular training, knowledge and experience the DSL will be equipped to attend and

contribute to child protection case conferences, strategy discussions and other interagency meetings.

The DSL will maintain detailed, accurate written records and child protection files ensuring that they are kept confidential and stored securely. When children leave school, the DSL will ensure child protection records are transferred separately from the main pupil file, ensuring secure transit and a confirmation of receipt will be obtained. This should be as soon as possible and within 5 days for an in-year transfer or within the first 5 days at the start of a new term to allow a school or colleague to have support in place for when a child arrives. Where child protection files are electronic the DSL will speak with the DSL of the receiving school and ensure they are aware of the protection concerns.

The DSL is responsible for ensuring that all staff members and volunteers are aware of the school's safeguarding policy and the procedures they need to follow. They will ensure that all staff, volunteers and regular visitors have received appropriate child protection training during induction.

The DSL will help promote educational outcomes by sharing information about the issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and leadership staff.

Opportunities to teach safeguarding
We will teach children how to keep themselves safe, including in relation to contextual factors.
Preventive education is most effective in the context of a whole-school or college approach that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia and sexual violence/harassment. This will be underpinned by our behaviour policy and pastoral system, as well as by a planned programme of evidence-based RSHE/RE delivered and reinforced throughout the whole curriculum.

Additional policies such as RSE Part B should be read in conjunction with this Safeguarding and CP Policy.
There are key themes running through the personal development curriculum of valuing your passions, your spirituality, each other, your work, your well-being and your future.
Specific examples of how this is integrated within the curriculum are clear when we focus on Year 10 curriculum which covers; In the first half-term How can I look after my mental health? Moving onto How to keep myself safe in an intimate relationship? Through to the final half-term topic of How do I protect myself against radicalisation? Year 8 final half term looks to address how to keep myself safe online.

TRAINING AND INDUCTION

All new members of staff or volunteers will be informed of safeguarding procedures, including the recording and reporting procedures as part of the induction process.
They will receive safeguarding training within the first half term of joining the trust. This programme will include information relating to signs and symptoms of abuse, how to manage a disclosure from a child, how to record concerns and the role of the designated safeguarding lead (DSL). The training will also include information about whistle-blowing in respect of concerns about another adult's behaviour and suitability to work with children.

All staff will receive online safety training and relevant staff who have an awareness and understanding of the provisions in place for filtering and monitoring. They will know how to escalate concerns.

In addition to the safeguarding induction, we will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one of '*Keeping Children Safe in Education'* DfE.
In order to achieve this, we will ensure that:

- All members of staff will undertake appropriate safeguarding training on an annual basis, including online safety.
- We will evaluate the impact of this training.
- All members of staff receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings), as required, but at least annually, to provide them with the relevant skills and knowledge to safeguard children effectively.

All regular visitors, temporary staff and volunteers to our school will be given a set of our safeguarding procedures; they will be informed of who the DSL and deputies are and what the recording and reporting system is. (See Appendix A).

The DSL, deputies and any other senior member of staff who may be in a position of making referrals or attending child protection conferences or core groups will attend appropriate training. In addition to formal training, the DSL will ensure that they update their knowledge and skills at regular intervals, but at least annually, to keep up with any developments relevant to their role.

The Trust will ensure that **all** governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures are effective and support a robust school approach to safeguarding. The training will be regularly updated.

We actively encourage all of our staff to keep up to date with the most recent local and national safeguarding advice and guidance, Annex A of '*Keeping Children Safe in Education*' provides links to guidance on specific safeguarding issues. In addition, throughout the school year we will brief staff on key issues identified by the school.

All staff are expected to read these key documents and fully **understand** their responsibility to keep children safe:

- Part One in full of '*Keeping Children Safe in Education*' DfE and Annex A
- Safeguarding and Child Protection policy
- Behaviour/anti-bullying policy
- Staff Code of Conduct
- Whistleblowing policy
- Safeguarding responses to children who go missing from education
- Role of the designated safeguarding lead (including the identity of the DSL and any deputies)

WORKING WITH PARENTS AND CARERS

The school is committed to working in partnership with parents/carers to safeguard and promote the welfare of children and to support them to understand our statutory responsibilities in this area.

When new pupils join one of our schools, parents and carers will be informed that we have a safeguarding policy. A copy will be provided to parents on request and is available on the school website. Parents and carers will be informed of our legal duty to assist our colleagues in other agencies with child protection enquiries and what happens should we have cause to make a referral to children's social care.

We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission or it is necessary to do so in order to safeguard a child from harm.

We will seek to share with parents any concerns we may have about their child *unless* to do so may place a child at increased risk of harm. A lack of parental engagement or agreement regarding the concerns the school has about a child will not prevent the DSL making a referral to children's social care in those circumstances where it is appropriate to do so.

In order to keep children safe and provide appropriate care for them, the school requires parents to provide accurate and up to date information regarding:

- Full names and contact details of all adults with whom the child normally lives
- Full names and contact details of all persons with parental responsibility (if different from above)
- Emergency contact details (if different from above); wherever possible school will hold more than one emergency contact for each child
- Full details of any other adult authorised by the parent to collect the child from school (if different from the above)

The school will retain this information on the children's file. The school will only share information about children with adults who have parental responsibility for a child or where a parent has given permission and the school has been supplied with the adult's full details in writing.
If in any doubt about information sharing, staff should speak to the DSL (or deputy). Fears about sharing information <u>must not</u> be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

- We will build a partnership approach to online safety and will support parents/carers to become aware of and alert to the potential online benefits and risks for children in a variety of ways. (See school-specific policies for details).

RELEVANT POLICIES

To underpin the values and ethos of our trust and our intent to ensure that pupils are appropriately safeguarded the following policies are also included under our safeguarding umbrella: (Please see individual school policies for detail of all relevant policies within each setting).

- ESF Staff code of conduct
- ESF Behaviour Policy

- ESF Student Code of Conduct
- ESF Anti-bullying Strategy
- ESF Child on Child Abuse Policy
- ESF Use of Reasonable Force, Searching, Screening and Confiscation Policy
- ESF Recruitment and selection
- ESF Whistle-blowing Policy
- ESF Statement of Procedures for Dealing with Allegations of Abuse Against Staff
- ESF Attendance Strategy
- ESF Home School Agreement
- ESF First Aid Policy
- ESF Educational Visits Policy
- ESF Health and Safety Policy
- ESF Equality Policy
- ESF Intimate Care Policy
- ESF Relationships and Sex Education Policy
- ESF Data Protection Policy

APPENDIX A: SAFEGUARDING INDUCTION SHEET (FOR NEW OR SUPPLY STAFF, VISITORS AND VOLUNTEERS)

We all have a statutory duty to safeguard and promote the welfare of children, and at our school we take this responsibility seriously.

If you have any concerns about a child or young person in one of our schools, you must share this information immediately with designated safeguarding lead (DSL) or deputy.

Do not think that your worry is insignificant if it is about hygiene, appearance or behaviour – we would rather you told us as we would rather know about something that appears small than miss a worrying situation.

If you think the matter is very serious and may be related to child protection, for example, physical, emotional, sexual abuse or neglect, you must find one of the designated safeguarding leads detailed below and provide them with a written record of your concern.

Please see school-specific policies for details of the process in each setting.

If you are unable to locate one of the designated safeguarding leads, ask a member of the school office staff to find them and to ask them to speak with you immediately about a confidential and urgent matter.

Any allegation concerning a member of staff, a child's foster carer or a volunteer should be reported immediately to the headteacher. If an allegation is made about the headteacher you should pass this information to the chair of the governing board. Alternatively, you can contact the local authority designated officer in the relevant local authority. NSPCC whistleblowing helpline is also 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 8:00am to 8:00pm, Monday to Friday or via email: help@nspcc.org.uk.

Please see school-specific policies for details of key staff in each setting.

APPENDIX B: ABUSE, NEGLECT AND EXPLOITATION

Indicators of abuse and neglect

Abuse: 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 community setting 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 by another child or children. Children may also cause harm to other family members, often referred to as child to parent or caregiver abuse.

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

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

Sexual abuse: involves forcing, causing or inciting a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, 14 including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it. There are specific offences for children under 13, who can never provide valid consent to sexual activity and

there are specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.

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

SPECIFIC SAFEGUARDING ISSUES

APPENDIX C: CHILD CRIMINAL EXPLOITATION (CCE) AND CHILD SEXUAL EXPLOITATION (CSE)

We know that different forms of harm often overlap and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. This can be committed or facilitated by an organised network or gang, and victims may identify as part of this group, this may constitute modern slavery.

In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

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.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- Appear with unexplained gifts, money or new possessions
- Associate with other children involved in exploitation
- Suffer from changes in emotional well-being
- Misuse drugs and alcohol
- Go missing for periods of time or regularly come home late
- Regularly miss school or education or do not take part in education

Children who have been exploited will need additional support to help maintain them in education. It is important to remember that some children will not realise that they are being exploited and may believe they are in a genuine romantic relationship.

CHILD CRIMINAL EXPLOITATION (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. It is important to note 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 criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

CHILD SEXUAL EXPLOITATION (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, can range from opportunist to complex organised abuse and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

It can involve force and/or enticement based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

CSE can 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. they believe they are in a genuine romantic relationship.

The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation.

Signs include:

- Underage sexual activity
- Inappropriate sexual or sexualised behaviour
- Sexually risky behaviour, e.g. 'swapping' sex
- Repeated sexually transmitted infections
- In girls, repeated pregnancy, abortions, miscarriage
- Having multiple mobile phones and worrying about losing contact via mobile phone
- Having unaffordable new things (clothes, mobile phone) or expensive habits (alcohol, drugs)
- Changes in the way they dress
- Going to hotels or other unusual locations to meet friends
- Seen at known places of concern
- Moving around the country, appearing in new towns or cities, not knowing where they are

- Getting in/out of different cars driven by unknown adults
- Having older boyfriends or girlfriends
- Contact with known perpetrators
- Involved in abusive relationships, intimidated and fearful of certain people or situations
- Hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- Recruiting other young people into exploitative situations
- Unexplained changes in behaviour or personality (chaotic, aggressive, sexual, mood swings, volatile behaviour and/or emotional distress)
- Self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- Getting involved in crime/police involvement, police records
- Involved in gangs, gang fights, gang membership
- Injuries from physical assault, physical restraint and/or sexual assault

COUNTY LINES

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children:

- Persistently going missing from home or school and subsequently found in areas away from their home
- In excessive receipt of calls and text messages
- In relationships with older, controlling individuals
- Associated with gangs
- Under suspicion of self-harm, physical assault or unexplained injuries
- With parental concerns
- Showing a significant decline in school performance
- Demonstrating significant changes in emotional wellbeing
- Have been the victim or perpetrator of serious violence (e.g. knife crime)
- Are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- Are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
- Are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity
- Owe a 'debt bond' to their exploiters

- Have their bank accounts been used to facilitate drug dealing

SERIOUS VIOLENCE

All staff should be aware of the indicators, which may signal 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
- 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 (see above).

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the designated safeguarding lead in the relevant school (or a deputy), who will assess the risk and take appropriate action. Where relevant this will include any action needed to de-escalate peer conflict.

APPENDIX D: SO-CALLED 'HONOUR'-BASED ABUSE (INCLUDING FGM AND FORCED MARRIAGE)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including:

- Female Genital Mutilation
- Forced Marriage
- Breast Ironing

Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the designated safeguarding lead (or deputy). Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Female Genital Mutilation (FGM)

What is FGM?

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

4 types of procedure:

Type 1	Type 2	Type 3	Type 4
Clitoridectomy: Partial/total removal of clitoris	Excision: Partial/total removal of clitoris and labia minora	Infibulation: Entrance to vagina is narrowed by repositioning the inner/outer labia	All other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area

Why is it carried out?

Belief that FGM:

- Brings status/respect to the girl – social acceptance for marriage
- Preserves a girl's virginity
- Is part of being a woman/rite of passage
- Upholds the family honour
- Cleanses and purifies the girl
- Gives a sense of belonging to the community
- Fulfils a religious requirement
- Perpetuates a custom/tradition
- Helps girls be clean/hygienic
- Is cosmetically desirable
- Mistakenly believed to make childbirth easier

FGM is internationally recognised as a violation of human rights of girls and women. It is **illegal** in most countries, including the UK.

Circumstances and occurrences that may point to FGM happening

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghanistan, Kurdistan, Indonesia and Pakistan)
- Knowledge that the child's sibling has undergone FGM
- Child talks about going abroad to be 'cut' or to prepare for marriage

Signs that may indicate a child has undergone FGM:

- Prolonged absence from school and other activities
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable
- Complaining about pain between the legs
- Mentioning something that somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinary tract infections
- Disclosure

Forced Marriage

Forcing a person into 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 the 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.

Signs and symptoms may include:

- Children may appear anxious, depressed and emotionally withdrawn with low self-esteem.
- They may have mental health disorders and display behaviours such as self-harming, self-cutting or anorexia.
- Sometimes they may come to the attention of the police having been discovered shoplifting or taking drugs or alcohol.
- Often children's symptoms can be exacerbated in the periods leading up to the holiday season.
- Children may present with a sudden decline in their performance, aspirations or motivation.
- They may be subject to excessive restrictions and control at home.
- Some children may not be allowed to attend any extra-curricular or after-school activities.
- Girls and young women may be accompanied to and from school/college, and even during lunch breaks.
- Some children may stop attending school or college.
- Their homework is incomplete or appears rushed. This may be the result of being actively discouraged from doing it by family members.
- Children may do their homework late at night, which frequently shows in school because they are lethargic, unable to concentrate and have a general appearance of tiredness.
- Professionals being told that the child is out of the country.
- There are occasions when older siblings (usually brothers) and cousins keep a close eye on girls to make sure that they do not meet anyone or talk to friends.
- Conflict between the child and their parents about whether the child will be allowed to continue their education.
- Family history of older siblings leaving education early and marrying early.

APPENDIX E: PREVENTING RADICALISATION

Children are vulnerable to extremist, mixed or unclear ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat **must** be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

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 or the internet) and settings (such as within the home).

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 Prevent referral.

The school's DSL (and deputies) should be aware of local procedures for making a Prevent referral.

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.

School leaders must:
- Familiarise themselves with the revised Prevent duty guidance: for England and Wales
- Take part in Prevent training and ensure staff have the relevant training
- Assess local risk of extremism
- Ensure there are robust IT protocols to filter out extremist materials
- Ensure school buildings are not being used to give a platform to extremists

Channel
Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.
Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

Understanding and recognising risks and vulnerabilities of radicalisation
Children and young people can be drawn into violence or they can be exposed to the messages of extremist groups by many means. These may include through the influence of family members or friends and/or direct contact with extremist groups and organisations or, increasingly, through the

internet. This can put a young person at risk of being drawn into criminal activity and has the potential to cause significant harm.

Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.
Possible indicators include:

- Use of inappropriate language
- Possession of violent extremist literature
- Behavioural changes
- Advocating violent actions including:
  - Association with known extremists
  - Seeking to recruit others to an extremist ideology

APPENDIX F: PRIVATE FOSTERING

Many people find themselves looking after someone else's child without realising that they may be involved in private fostering. A private fostering arrangement is one that is made privately (that is to say without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or immediate relative. If the arrangement is to last, or has lasted, for 28 days or more it is private fostering.

The Children Act 1989 defines a relative as a grandparent, brother, sister, uncle or aunt (whether of full blood or half blood or by marriage or civil partnership), or a step parent.

People become involved in private fostering for all kinds of reasons. Examples of private fostering include:

- Children who need alternative care because of parental illness
- Children whose parents cannot care for them because their work or study involves long or antisocial hours
- Children sent from abroad to stay with another family, usually to improve their educational opportunities
- Unaccompanied asylum-seeking and refugee children
- Teenagers who stay with friends (or other non-relatives) because they have fallen out with their parents
- Children staying with families while attending a school away from their home area

There is a mandatory duty on the school to inform children's social care of a private fostering Arrangement. Children's social care has a duty to check that the young person is being properly cared for and that the arrangement is satisfactory.

Further information:
Replacement Children Act 1989 Guidance on Private Fostering

APPENDIX G: CHILDREN MISSING FROM EDUCATION

All staff should be aware that children going missing, particularly repeatedly unexplainable and/or persistent absences from education, 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 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, 'honour'-based abuse or risk of forced marriage.

Behaviours linked to issues such as drug taking and/or alcohol misuse, 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. Staff should be aware of their school's or college's unauthorised absence and children missing from education procedures.
Further information can be found in Children missing education: statutory guidance for local authorities and schools.

APPENDIX H: SEXUAL VIOLENCE AND HARASSMENT BETWEEN CHILDREN IN SCHOOLS AND COLLEGES

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. The umbrella term 'harmful sexual behaviour' (HSB) is widely used in child protection and applies to behaviour occurring online, face-to-face, or both. HSB should always be considered within a child protection context

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that all victims are reassured 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Staff should never promise confidentiality when receiving a report, as it is highly likely that it will be in the best interests of the victim to seek advice from others in order to provide support and engage appropriate agencies.

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.

All staff have been made aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys" as this can lead to a culture of unacceptable behaviour, misogyny, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

- Recognising the escalatory nature of misogyny and the benefits of early identification to support their approach to minimising the risk of HSB, sexual harassment and sexual violence, and HSB
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts
- Dismissing or tolerating such behaviours risks normalising them

Sexualised behaviour

Green Behaviours…	Amber Behaviours…	Red Behaviours…
are part of safe and healthy sexual development which are: ● displayed between children or young people of similar age or developmental ability ● reflect curiosity, experimentation, consensual activities and positive choices ● 'normal' but inappropriate within the school/classroom setting	are potentially outside of safe and healthy development due to: ● age or developmental differences ● activity type, frequency, duration or context	are clearly outside of safe and healthy development and: ● involve much more coerciveness, secrecy, compulsiveness & threat ● require action from school & other agencies

For further information of sexualised behaviour thresholds visit Harmful sexual behaviour framework: an evidence-informed operational framework for children and young people displaying harmful sexual behaviours (nspcc.org.uk)

Sexual violence

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way and that it can happen both inside and outside of school/college. 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: they intentionally penetrate 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: they intentionally touch another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This

could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

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 they agree by choice to that penetration and has the freedom and capacity to make that choice. Further information about consent can be found here: Rape Crisis England & Wales - Sexual consent

- A child under the age of 13 can never consent to any sexual activity
- The age of consent is 16
- Sexual intercourse without consent is rape

Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. 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 sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
    - consensual and non-consensual sharing of nudes and semi-nudes intimate images and/or videos including those generated using AI e.g. deepfakes sharing of unwanted explicit content
    - upskirting (is a criminal offence)
    - sexualised online bullying
    - unwanted sexual comments and messages, including, on social media
    - sexual exploitation; coercion and threats

Upskirting

The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a persons' clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim.

Following a report of sexual violence, the designated safeguarding lead (or a deputy) should carry out an immediate risk and needs assessment involving all perpetrators and victims. For a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The school may need to contact statutory services such as social care or the police, this will be done swiftly to ensure all children are effectively safeguarded.

APPENDIX I: MODERN SLAVERY, TRAFFICKING AND CHILD ABDUCTION/COMMUNITY INCIDENTS

Modern slavery

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

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM (National Referral Mechanism) is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK

Human trafficking

Human trafficking is 'the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs'.

Child trafficking

"Child" shall mean any person under eighteen years of age. Any child transported for exploitative reasons is considered to be a trafficking victim, whether or not they have been forced or deceived. This is partly because it is **not considered possible for children to give informed consent**. Even when a child understands what has happened, they may still appear to submit willingly to what they believe to be the will of their parents or accompanying adults. It is important that these children are protected too.

Children are trafficked for many reasons, including sexual exploitation, domestic servitude, labour, benefit fraud and involvement in criminal activity such as pick-pocketing, theft and working in cannabis farms. There are a number of cases of minors being exploited in the sex industry. Although there is no evidence of other forms of exploitation such as 'organ donation or 'harvesting', all agencies should remain vigilant.

Children may be trafficked from other countries for a variety of reasons. There are a number of factors in the country of origin which might make children vulnerable to being trafficked.

The factors listed below are by no means a comprehensive list:

- Poverty
- Lack of education
- Discrimination

- Cultural attitudes
- Grooming
- Dysfunctional families
- Political conflict and economic transition and
- Inadequate local laws and regulations

Potential indicators that a child may have been trafficked
Once in the UK the child:

- Receives unexplained/unidentified phone calls whilst in placement/temporary accommodation
- Shows signs of physical or sexual abuse, and/or has contracted a sexually transmitted infection or has an unwanted pregnancy
- Has a history with missing links and unexplained moves
- Has gone missing from local authority care
- Is required to earn a minimum amount of money every day
- Works in various locations
- Has limited freedom of movement
- Appears to be missing for periods
- Is known to beg for money
- Performs excessive housework chores and rarely leaves the residence
- Is being cared for by adult/s who are not their parents and the quality of the relationship between the child and their adult carers is not good; is one among a number of unrelated children found at one address
- Has not been registered with or attended a GP practice
- Has not been enrolled in school
- Has to pay off an exorbitant debt, e.g. for travel costs, before having control over own earnings, is permanently deprived of a large part of their earnings by another person
- Is excessively afraid of being deported

Further information:
www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance

Child abduction and community safety incidents

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

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby, unknown adults engaging children in conversation, rumours about undesirable residents or adults in vehicles approaching children. As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe.

Safety within the community is addressed through dedicated assemblies and personal development lessons, these are particularly focussed on seasonal specific risks.

APPENDIX J: DOMESTIC ABUSE

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.
The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members or an institutional and community setting by those known to them or, more rarely, by others. (KCSIE)

The cross-government definition of domestic abuse is:
Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.
Domestic Abuse can impact on children through seeing, hearing or experiencing. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.
Children can also experience domestic abuse within their own intimate relationships. This form of child on child (including harassment and violence) is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures will be followed and both young victims and young perpetrators will be offered support.

Signs, indicators and effects:
It is often difficult to tell if domestic abuse is happening because it takes place in the family home and abusers can act very differently when other people are around. Children who witness domestic abuse may show signs of:

- Aggression and bullying
- Anti-social behaviour
- Depression, anxiety or have suicidal thoughts
- Attention seeking
- Bed wetting, nightmares or insomnia
- Drug and alcohol misuse
- Constant or regular sickness, such as colds and headaches
- Eating disorders
- Not doing as well in school – due to difficulties at home or disruption of moving to, as well as from, refuges
- Withdrawal

Other signs and symptoms may include:

- Sudden change of behaviour
- Clingy
- Soiling clothes
- Risk taking behaviours
- Missing school
- Changes in eating habits
- Obsessive behaviour
- Self-harm

Source: www.nspcc.org.uk

Some children may not display any symptoms/behaviours that may be a cause for concern. 'What is life like at home?' – is a good question to use regularly with all children.

All our schools are 'Operation Encompass' schools

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police should inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

APPENDIX K: HOMELESSNESS

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. (KCSIE)

Types of homelessness could include:

- Living in temporary or emergency accommodation (such as B & Bs and hostels)
- Hidden homelessness (staying with friends or family on a temporary basis or living in overcrowded conditions)
- Couch/sofa surfing, moving from one place to another

Impact of homelessness:

- Practical issues include loss of possessions required for school e.g. books, uniform etc.
- May be unkempt due to lack of laundry services
- Physically exhausted due to sleeping arrangements
- Emotionally exhausted due to increased stress
- Signs of severe emotional trauma leading to emotional stress, anxiety
- Changes in behaviour and/or problematic behaviour
- Child may become withdrawn or aggressive
- If placed out of area they may arrive late or miss school due to transport/financial difficulties

- The child's ability to maintain relationships may be affected
- May 'stand out' more to peers, leading to feelings of alienation and self-consciousness
- Impact on attainment levels and ability to learn

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised that in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. (KCSIE)

ANNEX L: EXAMPLE CAUSE FOR CONCERN FORM

Insert school

Full Name of Child:		**DOB:**
Time of concern:	**Date of concern:**	**Place of concern:**

Concern/Incident:

Detailed Account:

(Please bullet point. Do not interpret what is seen or heard; simply record the facts. After completing the form, pass it immediately to the designated safeguarding lead/deputy)

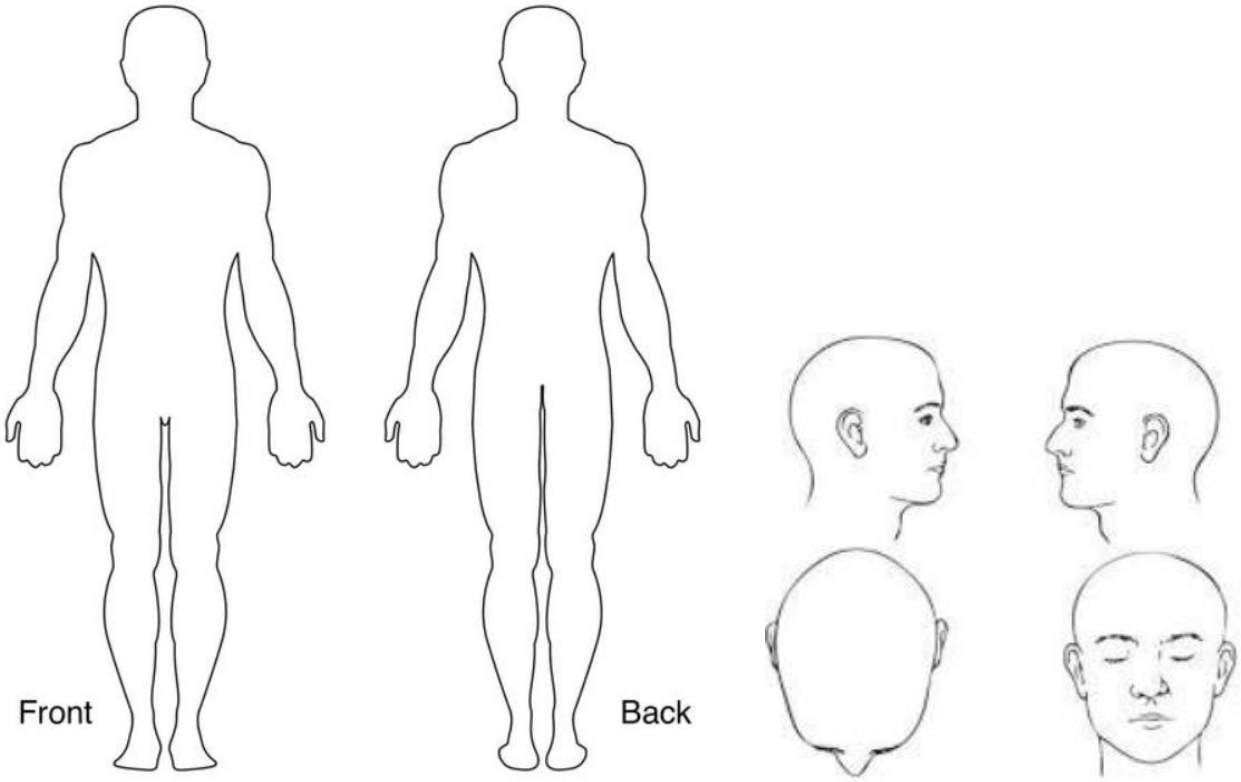
Staff Actions: (Bullet point any actions already taken and any future actions to be completed)

Member of Staff completing form	**Role/Title**

Please provide a copy to the designated safeguarding lead

ANNEX L: BODY MAP

Child's Full Name	DOB	Date



Description of injury/additional notes:		
Professional's Name	**Professional's Designation**	**Contact Number**

ANNEX L: DESIGNATED SAFEGUARDING LEAD CHECKLIST

Possible Action	By Whom	Outcome
Discuss with child		
Contact parents		
Check records in school		

Discuss with relevant professionals		
Check with schools who have siblings		
Seek advice from LA		
Monitor and review		
Consider an early help assessment (targeted)		
Consult with Social Care		
Contact police 101: Non-emergency 999: Immediate Danger		
Other (please specify)		
Assessment of Risk		
Safeguarding	Risk of Harm	Immediate Danger

APPENDIX M: SAFEGUARDING ONLINE

- It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. We will adopt a whole school approach to online safety which will empower, protect, and educate our learners and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.

- We will ensure online safety is reflected as required in all relevant policies. Online safety is considered as a running and interrelated theme when devising and implementing our policies and procedures and when planning our curriculum, staff training, the role and responsibilities of the DSL and parental engagement.

- The school identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
    - **Content**: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
    - **Contact**: being subjected to harmful online interaction with other users. For example, child on child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit children 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 making or sharing of nudes and semi-nudes intimate images and/or videos including those generated using AI e.g. deepfakes and/or pornography), sharing other explicit images and online bullying.
    - **Commerce**: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

- We recognise that technology, and the risks and harms related to it, evolve and change rapidly. The school will carry out an annual review of our approaches to online safety, supported by an annual risk assessment which considers and reflects the risks our children face.

- The Principal will be informed of online safety concerns by the DSL, as appropriate. The named governor for safeguarding will report on online safety practice and incidents, including outcomes, on a regular basis to the wider governing board.

Policies and Procedures

- The DSL has overall responsibility for online safety within the school but will liaise with other members of staff, for example IT technicians, curriculum leads etc. as necessary.

- The DSL will respond to online safety concerns reported in line with our child protection and other associated policies, including our anti-bullying, social media and behaviour policies.

    - Internal sanctions and/or support will be implemented as appropriate.
    - Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.

- We use a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet, our learning platform, intranet and email systems.
    - All school owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.
- We recognise the specific risks that can be posed by mobile and smart technology, cameras and wearable technology. In accordance with KCSIE 2026
- The school has appropriate mobile and smart technology, image use, online and acceptable use policies in place including safe use of generative AI, which are shared and understood by all members of the community.
- The DfE states that all schools should be mobile phone-free environments by default; anything other than this should be by exception only. Advice on Mobile phones in schools is clear that the department expects schools to implement a policy whereby pupils do not have access to their mobile phone throughout the school day including during lessons, the time between lessons, breaktimes and lunchtime. Mobile phones are not permitted in any of our schools, they should be switched off and in bags for the duration of the school day. Where a student is caught using their phone, staff will confiscate the phone and parents will be contacted. Follow up will be in accordance with the ESF Behaviour Policy.

Appropriate Filtering and Monitoring

The leadership and relevant staff are:

- Aware of all internet monitoring and filtering systems and will manage them effectively
- Will review their effectiveness at least annually
- Know how to escalate concerns when they are identified
- We will do all we reasonably can to limit children's exposure to online risks through school provided IT systems. We will ensure that appropriate filtering and monitoring systems are in place and are informed in part, by the risk assessment required by the Prevent Duty.

SENSO is used across the trust to monitor student activity.

To support schools and colleges to meet this duty, the Department for Education has published filtering and monitoring standards. See school-specific policies for details of actions taken following an incident/concern.

- All users will be informed that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights, and privacy legislation.
- Filtering breaches or concerns identified through our monitoring approaches will be recorded and reported to the DSL who will respond as appropriate.
- Any access to material believed to be illegal will be reported immediately to the appropriate agencies, such as the Internet Watch Foundation and the police.
- When implementing appropriate filtering and monitoring, we will ensure that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.

- We acknowledge that whilst filtering and monitoring is an important part of our online safety responsibilities, it is only one part of our approach to online safety.
    - Children will use appropriate search tools, apps and online resources as identified following an informed risk assessment.
    - Children's internet use will be supervised by staff according to their age and ability.
    - Children will be directed to use age appropriate online resources and tools by staff.

Information Security and Access Management

- School is responsible for ensuring an appropriate level of security protection procedures are in place, in order to safeguard our systems as well as staff and learners. Further information can be found in each school-specific policy.
- We will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

Staff Training

- We will ensure that all staff receive online safety training as part of induction and that ongoing online safety training and updates for all staff will be integrated, aligned and considered as part of our overarching safeguarding approach. Amongst other things, this includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

Educating Children

- We will ensure a comprehensive whole school curriculum response is in place to enable all children to learn about and manage online risks effectively as part of providing a broad and balanced curriculum. This will include teaching children how to critically evaluate risks and relationships online, as well as the risks posed with rapidly developing technology such as AI and deepfakes.

Working with Parents/Carers

- Each school will build a partnership approach to online safety and will support parents/carers to become aware of and alert to the potential online benefits and risks for children. See school-specific policies for details of these actions and key personnel.

Remote Learning

Specific guidance for DSLs and SLT regarding remote learning is available at DfE: <u>Providing remote education: non-statutory guidance for schools</u> and The Education People: <u>Remote Learning Guidance for SLT</u>

- We will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements.
- All communication with children and parents/carers will take place using school provided or approved communication channels; for example, school provided email accounts and phone numbers and agreed systems.
    - Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.

- Staff and children will engage with remote teaching and learning in line with existing behaviour principles as set out in our behaviour policy/code of conduct and acceptable use policies.
- Staff and children will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.
- When delivering remote learning, staff will follow our remote learning policy.
- Parents/carers will be made aware of what their children are being asked to do online, including the sites they will be asked to access. We will continue to be clear who from the school (if anyone) their child is going to be interacting with online.
- Parents/carers will be encouraged to ensure children are appropriately supervised online and that appropriate parent controls are implemented at home.

APPENDIX N: SUPPORT FOR SOCIAL TRANSITION

- **Process Initiation:** We will not proactively initiate social transition but will respond to requests made by a child or their parent. In line with KCSIE any degree of social transition will not include allowing access to toilets, changing rooms or boarding or residential accommodation designated for the opposite sex, and will not include allowing children to join PE classes designated for the opposite sex where there are safety reasons for single-sex PE. This will follow school obligations under the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014.
- **Parental Involvement:** Engaging parents or carers is a priority, and their views will be treated with importance. Any decision made will be collaborative, except in rare instances where parental involvement poses a risk to the child.
- **Safeguarding & Welfare:** The statutory duty to safeguard the child and their peers is paramount. Decisions must be based on the child's "best interests," which may not always align with the child's specific wishes. We will appropriately sanction any cases of bullying or harassment, and take a strong stand against bullying. We are conscious of the rights of pupils and staff in relation to their religion or belief. However, when supporting social transition we might consider discussing options with pupils and staff such as using names instead of pronouns.
- **Legal & Space Constraints:** We must comply with the Equality Act 2010 and Human Rights Act 1998. Social transition does not grant exceptions for access to opposite-sex toilets, changing rooms, or single-sex sports designated for safety.
- **Administration & Records:**
    - Biological sex must be accurately recorded in all cases.
    - Decision-making processes must be formally documented.
    - Decisions should remain flexible and reviewable, particularly for children "living in stealth" or those wishing to de-transition.

APPENDIX O: HANDLING INCIDENTS OF BULLYING AND HARASSMENT

1. Incident occurs
Staff member reports bullying or harassment (involving pupils, parents, staff or others)

2. Provide immediate support and assess the incident
Direct affected staff to appropriate support (e.g. Optima Care First Employee Assistance; Trade Union; HR)
Determine whether the incident meets the bullying or harassment criteria in school policy.
Consider the nature of the incident, pupil and parent involvement, proportionality, and whether police involvement may be required.
npcc - when to call the police guidance for schools.pdf police.uk

3. Check the relevant policy

Staff member is alleged perpetrator Follow staff behaviour policy, or code of conduct. ESF Code of Conduct September ; ESF Bullying, Harassment, SEPT 2026.pdf	**Pupil is alleged perpetrator** Follow the school behaviour policy.	**Parent is alleged perpetrator** Follow the parental code of conduct, home–school agreement or social media policy.	**Another third party is alleged perpetrator** Contact HR for advice

4. Decide the investigation lead
If the affected staff member is not the Principal or nominated lead, they manage the case with support from HR & the Trust.
If the affected staff member is the Principal or nominated lead, refer to Director of HR and Director of Education.

5. Can the case be resolved informally with the affected person's agreement?

YES Agree nature of informal resolution & record the action and outcome. Continue to monitor and support the affected staff member.	**NO** Move to the appropriate formal response below.

Staff-related response Consider formal procedures, including disciplinary procedure ESF DISCIPLINARY & APPEALS POLICY & PROCEDURE 2026.pdf	**Pupil-related response** Resolve under the school behaviour policy, involving the affected person where appropriate. Apply sanctions that are fair, consistent and proportionate.	**Parent-related/Third Party response** Use an appropriate response, such as mediation, verbal or written warnings, barring from the school site, or reporting to the police.

6. Is escalation necessary?
Consider police involvement if the incident could be a criminal offence.
Repeated harassment involving two or more incidents should be reported—do not delay reporting in order to gather evidence.

7. Is this a coordinated campaign?
For example, serial complaints from a parent/group of parents. If yes, refer to the complaints policy. ESF Complaints Policy.pdf

8. Record, communicate, monitor and review
Document decisions and actions, maintain appropriate communication, keep support in place, and review whether further action is required.