Brontë Academy Trust

Great schools. Inspirational people. Strong foundations.

Bronte Academy Trust
Lees Primary School
Child Protection and Safeguarding Policy

Reviewed By	Approved By	Date of Approval	Version Approved	Next Review Date
DH	Heads/Chair of Governors	1 Sep 26	V1	31 Aug 27

CONTENTS

Policy Statement
Definitions

1. Legislative framework and guidance
2. Equality Statement
3. Roles and responsibilities
4. Multi-agency working
5. Early help
6. Abuse, neglect and exploitation
7. Specific safeguarding issues
8. Child-on-child abuse
9. Online safety and personal electronic devices
10. Consensual and non-consensual sharing of indecent images and videos
11. Appropriate physical contact with pupils
12. Context of safeguarding incidents
13. Pupils potentially at greater risk of harm
14. Use of the school premises for non-school activities
15. Alternative provision
16. Concerns about pupils
17. Manging Referrals
18. Staff procedures for reporting concerns about staff conduct
19. Concerns about school safeguarding practices
20. Safeguarding concerns and allegations of abuse against staff
21. Communication and confidentiality
22. Safer recruitment
23. Single central record (SCR)
24. Training
25. Monitoring and review

Appendices

1. Specific safeguarding issues
2. Categories of abuse, signs and indicators
3. CME, EHE and AP
4. Radicalisation – what research tells us to be mindful of
5. Child on Child Abuse including Sexual Violence, Sexual Harassment and Harmful Sexual Behaviours
6. Local & National Organisation's Contact Details

POLICY STATEMENT

Bronte Academy Trust and the academies within the Trust are committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil, both inside and outside of the school premises. We implement a whole-school preventative approach to managing safeguarding concerns, ensuring that the wellbeing of pupils is at the forefront of all action taken.

Safeguarding permeates all aspects of life at our school. We recognise that we are an important part of the wider safeguarding system for children, that everyone in school is responsible for safeguarding and has a valuable contribution to make. We aim to provide a positive, stimulating caring and safe environment which promotes the social, physical, emotional and moral development of each child. We will strive to ensure that all pupils remain safe and free from harm and are committed to playing a full and active part in multi-agency safeguarding processes and responses.

This policy gives clear direction to staff, volunteers, governors, visitors and parents about our school and Bronte Academy Trust's safeguarding responsibilities and procedures. It also lays out our expectations and makes clear the ways in which everyone will safeguard and promote the welfare of pupils. This policy and related procedures will be central to staff training and induction.

The school and Trust's policies and procedures apply at all times where services or activities are provided under the direct management of school staff. These are reviewed as and when required and at least annually. Should any deficiencies or weaknesses in safeguarding and child protection arrangements become apparent they will be remedied without delay.

Our culture is underpinned with the knowledge that "it could happen here".

DEFINITIONS

The terms **"children"** and **"child"** refer to anyone who is yet to reach their 18th birthday (our commitment to safeguarding and promoting welfare extends to all children, young people and adults who may be vulnerable)

For the purposes of this policy, **"safeguarding and protecting the welfare of children"** is defined as:

- Providing help and support to meet the needs of pupils as soon as problems emerge
- Protecting pupils from maltreatment, whether that is within or outside the home, including online
- Preventing the impairment of pupils' mental and physical health or development
- Taking action to enable all pupils to have the best outcomes

For the purposes of this policy, **"consent"** is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity, and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

For the purposes of this policy, **"sexual violence"** refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their 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 their body or anything else, the penetration is sexual, B does not consent to 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.
- **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.

For the purposes of this policy, **"sexual harassment"** refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a pupil's dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling
- Sexual "jokes" and taunting
- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying images of a sexual nature
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and / or sexual violence. This includes:
    - The consensual and non-consensual sharing of nude and semi-nude images and / or videos
    - sharing unwanted explicit content
    - upskirting
    - sexualised online bullying
    - Unwanted sexual comments and messages, including on social media
    - Sexual exploitations, coercion, and threats

For the purposes of this policy, **"upskirting"** refers to the act, as identified the Voyeurism (Offences) Act 2019, of taking a picture or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

Upskirting is a criminal offence. Anyone, including pupils and staff, or any gender can be a victim of upskirting.

For the purposes of this policy, the **"consensual and non-consensual sharing of nude and semi-nude images and/or videos",** colloquially known as **"sexting",** and collectively called **"youth-produced sexual imagery"** is defined as the creation of sexually explicit content by a person under the age of 18 that is

shared with another person under the age of 18. This definition does not cover persons under the age of 18 sharing adult pornography or exchanging messages that do not contain sexual images.

"Deep fakes" and **"deep nudes"** refer to digitally manipulated and AI-generated nudes and semi-nudes.

For the purposes of this policy, **"indecent imagery"** is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing
- A child touching themselves in a sexual way
- Any sexual activity involving a child
- Someone hurting a child sexually
- Sexual activity that involves animals

Indecent images also include indecent **"pseudo-images",** which are images that have been created or manipulated using computer software and / or AI.

For the purposes of this policy, **"abuse"** is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

For the purposes of this policy, **"physical abuse"** is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, deliberately induces, illness in a child.

For the purposes of this policy, **"emotional abuse"** is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child the opportunities to express their views, deliberately silencing them, 'making fun' of what they say or how they communicate. It may feature age-or developmentally inappropriate expectations being imposed on children, such as interactions that are beyond their developmental capability, 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 the child to frequently 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, but it may also occur alone.

For the purposes of this policy, **"sexual abuse"** is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people at any gender and age.

For the purposes of this policy, **"neglect"** is defined as the persistent failure to meet a child's basic physical and / or psychological needs, likely to result in serious impairment of a child's health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

1 LEGISLATIVE FRAMEWORK AND GUIDANCE

This policy is consistent with relevant legislation, regulations, statutory and non-statutory guidance including, but not limited to the following:

Legislation

- Children Acts 1989 and 2004
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Safeguarding Vulnerable Groups Act 2006
- Apprenticeships, Children and Learning Act 2006
- Equality Act 2010
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Anti-social Behaviour, Crime and Policing Act 2014
- Counter-Terrorism and Security act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022

Statutory guidance

- Home Office 'Prevent duty guidance: Guidance for specified authorities in England and Wales'
- DfE 'Working Together to Safeguard Children 2023' (with updates)
- DfE 'Disqualification under the Childcare Act 2006'
- DfE 'Keeping children safe in education 2026'
- DfE 'Working together to improve school attendance'
- HM Government 'Multi-agency statutory guidance on female genital mutilation'
- HM Government 'Channel Duty Guidance: Protecting people susceptible to radicalisation'
- Home Office and Foreign, Commonwealth and Development Office 'Multi-agency statutory guidance for dealing with forced marriage and multi-agency practice guidelines: Handling cases of forced marriage'

Non-statutory guidance

- DfE 'What to do if you're worried a child is being abused'
- DfE 'Child sexual exploitation'
- DfE 'Filtering and monitoring standards for schools and colleges'
- DfE 'Information sharing'

- DfE ‘Sharing nudes and semi-nudes: advice for education settings working with children and young people’
- DfE ‘Teachers’ Standards’
- DfE ‘Recruitment teachers from overseas’
- DfE ‘Meeting digital and technology standards in schools and colleges’
- Department of Health and Social Care ‘Virginity testing and hymenoplasty: multi-agency guidance’
- DfE ‘Restrictive interventions, including the use of reasonable force, in schools’

Effective safeguarding demands that all children should be protected from all forms of abuse, violence and harassment. It also relates to a broad range of other issues, policies and procedures. Safeguarding is at the very forefront of and underpins all aspects of policy development and practice in our school and across Bronte Academy Trust. Therefore, this document must be read, understood and applied in line with the associated policies and procedures:

- Online Safety Policy
- Behaviour Policy
- Intimate Care Policy
- Attendance Policy
- Code of Conduct
- Safer Recruitment Policy
- Artificial Intelligence Policy
- Children Missing from Education Policy
- Anti-bullying Policy
- Suspension and Exclusion Policy
- Cyber-security Policy
- Data Protection Policy
- Records Management Policy
- LAC Policy
- Whistleblowing Policy
- Allegations of Abuse Against Staff Policy
- Safer Recruitment Policy
- Social, Emotional and Mental (SEMH) Policy
- Staff Disqualification Declaration Form

2 EQUALITY STATEMENT

Some children have an increased risk of abuse, and additional barriers can exist in recognising or disclosing it. We are committed to anti-discriminatory practice and to recognising and responding to children’s diverse circumstances. We ensure that all children receive the same level of protection, while recognising and addressing the barriers they may face.

We give special consideration to children who:

- Have special educational needs or disabilities (SEND)
- Are living in challenging circumstances, such as temporary accommodation or family environments affected by substance misuse, mental health issues, or domestic abuse
- Are young carers
- May experience discrimination due to race, ethnicity, disability, religion, gender identity
- Have English as an additional language (EAL)
- Are at risk of female genital mutilation (FGM), child sexual exploitation (CSE), forced marriage or radicalisation
- Are asylum seekers or refugees

- Are in care, previously looked after, or living in alternative care arrangements (including private fostering and kinship care)

3 ROLES AND RESPONSIBILITIES

Safeguarding is everyone's responsibility and our whole-school approach reflects this. Some staff members have additional or specific responsibilities for safeguarding:

Safeguarding governance
Bronte Academy Trust Board is responsible for ensuring that all schools have a robust culture of safeguarding and that all policies, systems and practice is compliant with legal and statutory duties. The Trust Board delegates some of its safeguarding responsibilities to its committees, including the school's Local Governing Body.

While the Designated Safeguarding Lead takes ultimate responsibility for this, trustees and governors recognise their responsibility to ensure that the appropriate filtering systems and mechanisms are in place and monitor their effectiveness in line with the relevant standards.

Those responsible for governance hold senior leaders to account, are well trained (in accordance with KCSIE), visible and proactive in undertaking this. Trustees and governors also recognise the expertise staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis. Therefore, it works with the Executive Headteacher / Head of School and Designated Safeguarding Leads (DSL) to ensure that staff have opportunities to contribute to and shape safeguarding arrangements in school.

Some governors have additional and specific safeguarding responsibilities.

Chair of Governors
The Chair of Governors will liaise with the CEO in the event of an allegation against the Executive Head / Head of School and, where appropriate, the local authority's designated officer (LADO)

Nominated Safeguarding Governor (NSG)
The NSG acts as a conduit between the DSL, the LGB and the Trust on safeguarding matters. The Designated Safeguarding Lead meets and provides updates to the Nominated Safeguarding Governor every half term. NSGs are also active participants in the Trust's safeguarding reviews.

Name / Role	**Contact Information**
Gareth Williams – Nominated Safeguarding Governor	Gareth.williams@bronteacademytrust.org.uk

Designated Safeguarding Leads (DSLs)

Name / Role	**Contact Information**
Mr James Travers – Designated Safeguarding Lead (DSL)	James.travers@bronteacademytrust.org.uk
Ms Lucy Keefe – Deputy DSL	Lucy.keefe@bronteacademytrust.org.uk
Claire Muldowney – Deputy DSL	Claire.muldowney@bronteacademytrust.org.uk
Danielle George – Deputy DSL	Danielle.george@bronteacademytrust.org.uk
Tamsin Blayney – Deputy DSL	Tamsin.blayney@bronteacademytrust.org.uk
Louise Kelly – Deputy DSL	Louise.kelly@bronteacademytrust.org.uk

- Taking lead responsibilities for safeguarding and child protection (including online safety and understanding filtering and monitoring in place)
- Promoting and embedding a culture of listening to children, taking account of their wishes and feelings, and high aspiration for children who might be especially vulnerable (including online and also in respect of their educational outcomes)
- Managing referrals and leading the school's safeguarding response, including at multi-agency level
- Overseeing and managing safeguarding record keeping and information sharing
- Steering, supporting and advising staff
- Acting as a key safeguarding conduit for the Executive Headteacher and governors

The CEO ensures that the DSLs have the status, training, additional time, funding, resources and support they need to discharge their responsibilities.

DDSLs are supported by the DSL, through group and individual supervision. The DSL is supported by the CEO or may decide to seek support from an external supervisor. On a day-to-day basis safeguarding activity may be delegated to a Deputy Designated Safeguarding Lead (DDSL) but final lead responsibility remains with the DSL.

Training
The DSL / DDSLs are all trained to the same standard, at least every two years. They also attend appropriate refresher training at least annually. The DSL is a senior member of staff.

Knowledge
The DSL / DDSLs all understand their role and responsibilities, can manage referrals and know how to identify, understand and respond to:

- Specific needs that increase vulnerability
- The unique risks associated with online safety (and have the relevant knowledge and up to date capability required to keep children safe whilst they are online)
- Specific harms that can put children at risk

Managing referrals
The DSL / DDSLs will refer cases:

- Of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care
- To the Channel Programme where there is a radicalisation concern as required and support staff who make referrals to the Channel Programme

Vulnerable children
DSLs are also alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers (Children Act 1989) and recognise the additional risks that looked after, previously looked after and children with special educational needs and disabilities (SEND) face online, e.g. from online bullying, grooming and radicalisation and have the capability to support these children to stay safe online.

The Point of Contact in School and A Source of Advice and Support
We recognise that the Designated Safeguarding Lead (DSL) (and their Deputies (DDSLs)) are most likely to have a complete safeguarding picture in school. Wherever possible, staff will always notify (verbally and via CPOMS) and speak to the DSL (or DDSL in their absence) if they have a concern about a child's welfare, however 'minor' this might seem. This will happen as soon as possible and always that same (school) day. During term time, the DSL and / or a DDSL will always be available (during school hours) for staff in the school to discuss any safeguarding concerns with.

DSL's will monitor and review concerns and open cases through CPOMs, ensuring that all incidents are acknowledged, assessed and actioned. These will be reviewed, with all DDSLs through group supervision.

Staff Responsibilities

Recognising Abuse, neglect and Exploitation:

- All staff are able to identify and recognise all forms of abuse, neglect and exploitation
- School staff are well placed to observe any physical, emotional or behavioural signs which indicate that a child maybe suffering significant harm
- All staff therefore receive regular training which ensures they are able to identify indicators of abuse, neglect and exploitation
- Training is updated I order to ensure that all staff can identify and respond to new, specific and emergent risks and threats
- All staff must read at least Part One of Keeping Children Safe in Education
- It is vital that all staff exercise professional curiosity so that they are able to identify cases of children who may be in need of help or protection
- All staff are aware that safeguarding incidents and / or behaviours can be associated with factors outside the school and / or can occur between children outside of these environments
- All staff, but especially the DSL / DDLSs should consider whether children are at risk of abuse or exploitation in situations outside of 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), criminal exploitations, serious youth violence, county lines and radicalisation
- All staff are aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing and misogynistic / misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content
- There are myriad potential indicators, physical, emotional and / or behavioural. Some are quite generic and apply to more than one form of abuse while others are more contextually specific. Similarly, potential indicators might vary considerably from person to person, depending on their experience(s), circumstances and capacities
- Descriptors of types of abuse and exploitation and possible signs are outlined in Appendix 1
- All staff must familiarise themselves with all types of abuse, including the procedures to follow for specific safeguarding issues – Appendix 1
- Whatever the form of abuse or neglect, we will always put the needs of children first when determining what action to take

Staff will demonstrate a mindset of 'it could happen here' where safeguarding is concerned and identify any safeguarding concerns, including potential indicators of all forms of abuse, neglect and exploitation

4 MULTI-AGENCY WORKING

The school contributes to multi-agency working as part of its statutory duty. The school is aware of and will follow the local safeguarding arrangements.

The school will be fully engaged, involved and included in the child-centred approach towards local safeguarding arrangements. Once the school is named as a relevant agency by local safeguarding partners,

it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies.

The school will develop trusting relationships between families and agencies to protect the welfare of its pupils, through the early help process and by contributing to multi-agency plans to provide additional support.

Where a need for early help is identified, the school will allow access for CSCS from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.

The school will also be mindful of the importance of inter-agency working in identifying and preventing CSE.

The school will reflect the DfE's expectations to secure strong multi-agency working by:

- Collaborating with services to achieve shared goals and share information
- Learning from evidence and sharing perspective to evaluate provision
- Prioritising and sharing resources depending on pupils' needs
- Celebrating inclusivity and diversity and challenging discrimination
- Mutually and constructively challenging other's assumptions in a respectful manner

Information Sharing

The school recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet pupils' needs and identify any need for early heal.

Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.

Staff members will be made aware that safeguarding partners may take legal action against them if they do not share specified information when a request is made for the purposes of safeguarding.

Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils. If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSLs.

5 EARLY HELP

Early help means providing support as soon as a problem emerges, at any point in a child's life. The school will be proactive in ensuring that every pupil is able to access full-time education to aid their development and protect them from harm whilst utilising the unique position of having regular daily contact with pupils to identify concerns as early as possible.

All staff are aware of their local early help process and understand their role in it.

All staff are alert to the potential need for early help for a child who:

- Are disabled, have certain health conditions, or have a specific additional need
- Has special educational needs (whether or not they have a statutory education health and care plan (EHCP)
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse

- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social criminal behaviour, including being affected by gangs and county lines and organised crime groups and / or serious violence, including knife crime
- Is frequently missing / goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and / or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and / or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is misusing drugs or alcohol
- Is suffering from mental health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or has not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

Staff will be mindful of all signs of abuse, neglect and exploitation and use their professional curiosity to raise concerns to the DSL.

The DSL will take the lead where early help is appropriate. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required.

Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to CSCS for assessment for statutory services if the pupil's situation is not improving or is worsening.

6 ABUSE, NEGLECT AND EXPLOITATION

All staff will be aware of the indicators of abuse, neglect and exploitation and will understand that children can be at risk of harm inside and outside of the school, inside and outside of home, in an institutional or community setting by those known to them or by others, and online. Staff will also be aware that pupils can be affected by seeing, hearing or experiencing the effects of abuse.

The school will recognise that abuse or neglect of a child may occur through the infliction of harm or through the failure to act to prevent harm. The school will understand that harm can include ill treatment that is not physical in nature, as well as the psychological impact of witnessing the ill treatment of others.

The school will pay particular attention to the effects of domestic abuse on children, recognising that harm may arise not only when children are directly involved, but also when they see, hear or otherwise experience its consequences. All necessary steps will be taken to identify and respond appropriately to such concerns in order to safeguard and promote the welfare of all pupils.

All staff will understand that abuse, neglect, exploitation and other safeguarding issues are rarely standalone events that can be given a specific definition or on label alone. Staff will understand that, in most cases, multiple issues will overlap one another, therefore, staff will be vigilant and always raise concerns with the DSL.

All staff, especially the DSL and deputy DSLs, will be aware that safeguarding incidents and / or behaviours can be associated with factors outside the school and / or can occur between children outside of these environments; this includes being aware that pupils can be at risk of abuse or exploitation in situations outside their families (extra-familial harms). All staff will be aware of the appropriate action to take following a pupil being identified as at potential risk of abuse and in all cases, will speak to the DSL if they are unsure.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

7 SPECIFIC SAFEGUARDING ISSUES

There are certain specific safeguarding issues that can put children at risk of harm – staff will be aware of these issues

Appendix A of this policy sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues.

8 CHILD-ON-CHILD ABUSE

For the purposes of this policy, "child-on-child" is defined as abuse between children.

The school has a zero-tolerance approach to abuse, including child-on-child abuse.

All staff will be aware that child-on-child abuse can occur between pupils of any age and gender, both inside and outside of school, as well as online. All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. All staff will speak to the DSL if they have any concerns about child-on-child abuse.

All staff will understand the importance of challenge inappropriate behaviour between peers, and will not tolerate abuse as "banter" or "part of growing up".

Child-on-child abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying
- Abuse in intimate personal relationships between peers – sometimes known as 'teenage relationship abuse'
- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse
- Sexual violence – this may include an online element which facilitates, threatens and / or encourages sexual violence
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent
- The consensual and non-consensual sharing of nude and semi-nude images and / or videos
- Upskirting
- Initiation – and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group, and may also include an online element

Some children may be particularly vulnerable and have an increased risk of abuse. The school will recognise that children with SEND or certain health conditions are three times more likely to be abused by

their peers, can face additional safeguarding challenges and may be more prone to child-on-child group isolation or bullying (including prejudice-based bullying) than other children. The school will consider extra pastoral support for those children.

All pupils have the right to be safeguarded from harm regardless of race, religion, ethnicity, age, gender, sexuality or disability. The school will give special consideration to, amongst others, children who:

- Have SEND
- Are vulnerable to being bullied
- Are looked after or living in unsupportive home situations

The DSL will ensure they appropriately assess all instances of child-on-child abuse, including in cases of image-based abuse, to help determine whether the alleged perpetrator(s) is under the age of 18 or is an adult posing as a child. The DSL will immediately refer the case if it is found that a so-called child-on-child abuse incident involves an adult, e.g. where an adult poses as a child online to groom a child or young person.

All staff will be clear as to the school's policy and procedures regarding child-on-child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Pupils will also be reassured that they will be taken seriously, be supported, and kept safe.

9 ONLINE SAFETY AND PERSONAL ELECTRONIC DEVICES

The school will adhere to the Online Safety Policy at all times.

As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online.

Through training, all staff members will be made aware of:

- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online
- The procedure to follow when they have a concern regarding a pupil's online activity

Staff training in online safety will cover the four categories of risk as outlined in KCSIE:

- Content – staff will be trained to understand the risks associated with being exposed to illegal, inappropriate, or harmful material. This will include, but not be limited to, content relating to pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation, and conspiracy theories.
- Contact – training will address the risks of harmful online interaction with other users. This will include peer-to-peer pressure, exposure to commercial advertising, and the threat posed by adults impersonating children or young people with the intention of grooming or exploiting them for sexual, criminal, financial, or other purposes.
- Conduct – staff will be made aware of how certain online behaviours may increase the likelihood of harm or result in actual harm. This will encompass activities such as creating, sending, or receiving explicit images, the distribution of other explicit material, and instances of online bullying.
- Commerce – the programme will also cover risks related to online commerce. These will include dangers such as online gambling, exposure to inappropriate advertising, phishing attempts, and other types of financial scams

Any concerns that pupils or staff may be at risk will be reported through appropriate safeguarding channels.

The school will ensure that appropriate filtering systems are in place on school devices and school networks to prevent children accessing inappropriate material, in accordance with the school's Cyber-security Policy. The appropriateness of the school's filters and monitoring systems will be informed by the Filtering and monitoring standards, the Cyber security standards for schools and colleges, and the risk assessment required by the Prevent Duty. The school will, however, ensure that the use of filtering and monitoring systems does not cause "over blocking", which may lead to unreasonable restrictions as to what pupils can be taught online. The school will also ensure that it meets the filtering and monitoring standards published by the DfE.

Staff will be aware of the filtering and monitoring systems in place and will know how to escalate concerns where they are identified. Staff will be made aware of their expectations and responsibilities relating to filtering and monitoring systems during their induction.

Further information regarding the school's approach to online safety can be found in the Online Safety Policy.

Communicating with Parents

As part of the usual communication with parents, the school will reinforce the importance of pupils being safe online and inform parents that they will find it helpful to understand what systems the school uses to filter and monitor internet use.

The school will also make it clear to parents what their children are being asked to do online for school.

Personal electronic devices

The use of personal electronic devices, including mobile phones and cameras, by staff is monitored by the school, in accordance with the Staff ICT and Electronic Devices Policy.

Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the Trust's Data Protection Policy.

Where photographs and videos will involve pupils who are LAC, adopted pupils, or pupils for whom there are security concerns, the executive headteacher will liaise with the DSL to determine the steps involved. The DSL will, in known cases of pupils who are LAC or who have been adopted, liaise with pupils' social workers, carers or adoptive parents to assess the needs and risks associated with the pupils.

Staff will report any concerns about pupils' or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures.

Upskirting

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting. "Operating equipment" includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion-activated camera.

Upskirting will not be tolerated by the school. Any incidents of upskirting will be reported to the DSL, who will then decide on the next steps to take, which may include police involvement.

10 CONSENSUAL AND NON-CONSENSUAL SHARING OF INDECENT IMAGES AND VIDEOS

The school will ensure that staff are aware to treat the consensual and non-consensual sharing of nude and semi-nude images and / or videos (also known as "sexting" or youth-produced sexual images) as a safeguarding concern.

Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes in the school community, including understanding motivations, assessing risks posed to pupils depicted in the images, and how and when to report instances of this behaviour.

Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that pupils are not unnecessarily criminalised.

Staff will also be made aware that the laws imposed on the sharing of nudes and semi-nudes applies to digitally manipulated and AI-generated imagery.

Where a member of staff becomes aware of an incidence of sharing nudes and / or semi-nudes, they will refer this to the DSL as soon as possible. The DSL will work to support the affected pupils and inform them of the reporting routes to remove a nude or semi-nude that has been shared online or to prevent an image from being shared online.

The school's full response to incidents of consensual and non-consensual sharing of indecent images and videos can be found in the Youth-produced Sexual Imagery Policy, including the appropriate reporting routes for both staff and pupils.

11 APPROPRIATE PHYSICAL CONTACT WITH PUPILS

The school will not operate a 'no contact' policy. The school will also not agree to any request from parents or staff that would prevent the use of reasonable force and other restrictive interventions where these may be necessary and lawful. A 'no contact' approach could leave staff unable to intervene appropriately to safeguard pupils and others.

Use of physical intervention will be managed in line with the Trust's Physical Intervention Policy.

The school will adopt sensible policies and practices which will allow and support staff to make appropriate physical contact with pupils where this is necessary, proportionate and in the best interests of the child. There will be circumstances in which physical contact will be appropriate and will not give rise to concerns about the use of reasonable force or restrictive interventions.

Examples of circumstances where physical contact will generally be appropriate include:

- Providing first aid
- Guiding or escorting pupils, e.g. holding the hand of a younger pupil when moving around the school or on a school trip, supporting a pupil to move to a space they have chosen to access in order to self-regulate, or assisting pupils to move safely
- Comforting a distressed pupil
- Congratulating or praising a pupil, e.g. a handshake or a brief pat on the back
- Demonstrating how to use a musical instrument
- Demonstrating exercises or techniques during PE lessons or sports coaching

When deciding whether physical contact will be appropriate in a particular situation, staff will use their professional judgement and will have regard to:

- This policy and any other relevant policy
- The context and circumstances, including whether other adults are present
- The individual pupil's age and level of understanding
- Any other relevant factors, including, but not limited to:
    - Whether the pupil has SEND or other vulnerabilities
    - Whether alternative strategies that do not involve physical contact could be used

12 CONTEXT OF SAFEGUARDING INCIDENTS

Safeguarding incidents can occur outside of school and can be associated with outside factors. All staff, particularly the DSLs, will always consider the context of safeguarding incidents. Assessment of pupils' behaviour will consider whether there are wider environmental factors that are a threat to their safety and /or welfare. The school will provide as much contextual information as possible when making referrals to CSCS.

13 PUPILS POTENTIALLY AT GREATER RISK OF HARM

The school recognises that some groups of pupils can face additional safeguarding challenges, both online and offline, and understands that further barriers may exist when determining abuse and neglect in these groups of pupils. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outlined below.

Pupils who need social workers

Pupils may need social workers due to safeguarding or welfare needs. These needs can leave pupils vulnerable to further harm and educational disadvantage.

As a matter of routine, the DSL will hold and use information from the LA about whether a pupil has a social worker in order to make decisions in the best interests of the pupil's safety, welfare, and educational outcomes.

Where a pupil needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare, e.g. considering the provision pastoral or academic support.

Home-educated children

Parents may choose elective home education (EHE) for their children. In some cases, EHE can mean that children are less visible to the services needed to safeguard and support them.

In line with the School Attendance (Pupil Registration) (England) Regulations 2024, the school will inform the LA of all deletions from the admissions register when a pupil is taken off roll.

Where a parent has expressed their intention to remove a pupil from school for EHE, the school, in collaboration with the LA and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the pupil has SEND, is vulnerable, and / or has a social worker.

LAC and PLAC

Children most commonly become looked after because of abuse and / or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. PLAC, also known as care leavers, can also remain vulnerable after leaving care.

The governing board will ensure that staff have the skills, knowledge and understanding to keep LAC and PLAC safe. This includes ensuring that the appropriate staff have the information they need, such as:

- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order
- Contact arrangements with parents or those with parental responsibility
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the pupil

The DSL will be provided with the necessary details of pupils' social workers and the VSH, and, for PLAC, personal advisers.

Pupils with SEND

When managing safeguarding in relation to pupils with SEND, staff will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's disability without further exploration; however, it should never be assumed that a pupil's indicators relate only to their disability
- Pupils with SEND can be disproportionally impacted by issues such as bullying, without outwardly showing any signs
- Communication barriers may exist, as well as difficulties in overcoming these barriers

When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue relating to a pupil with SEND, the DSL will liaise with the school's SENDCO, as well as the pupil's parents where appropriate, to ensure that the pupil's needs are met effectively.

LGBTQ+ pupils

The fact that a pupil may be LGBTQ+ is not in itself an inherent risk factor for harm; however, staff will be aware that LGBTQ+ pupils can be targeted by other individuals. Staff will also be aware that, in some cases, a pupil wo is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as pupils who identify as LGBTQ+.

Staff will also be aware that the risks to these pupils can be compounded when they do not have a trusted adult with whom they can speak openly with. Staff will endeavour to reduce the additional barriers faced by these pupils and provide a safe space for them to speak out and share any concerns they have.

Pupils requiring mental health support

All staff will be made aware that mental health problems can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation.

14 USE OF THE SCHOOL PREMISES FOR NON-SCHOOL ACTIVITIES

Where the school hires or rents out its facilities or the school premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate safeguarding

arrangements are in place to keep pupils safe. The school will refer to the DfE's guidance on keeping children safe in and out-of-school settings in these circumstances.

Where the school provides the activities under the direct supervision or management of school staff, child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case, therefore, the school will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The school will also ensure that there are arrangements in place to liaise with the school on these matters where appropriate. The school will ensure safeguarding requirements are included in any transfer of control agreement i.e. lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement.

Extracurricular activities and clubs

External bodies that host extracurricular activities and clubs at the school, e.g. charities or companies, will work in collaboration with the school to effectively safeguard pupils and adhere to local safeguarding arrangements.

Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to CSCS or the police, if necessary.

All national governing bodies of sport that receive funding from either Sport England or UK Sport must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

15 ALTERNATIVE PROVISION

The school will remain responsible for a pupil's welfare during their time at an alternative provider. When placing a pupil with an alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff and will satisfy itself that the placement is meeting the pupil's needs.

Those responsible for the commissioning of alternative provision will be aware that pupils in alternative provision will often have complex needs – they will be mindful of the additional risk of harm that these pupils may be vulnerable to.

16 CONCERNS ABOUT PUPILS

If a member of staff has any concern about a pupil's welfare, or a pupil has reported a safeguarding concern in relation to themselves or a peer, they will act on them immediately by speaking to the DSL or deputy DSLs.

Staff will be aware that pupils may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and / or they may not recognise their experiences as harmful. Staff will be aware that this must not prevent them from having professional curiosity and speaking to the DSL, or deputy DSL, if they have a concern about a pupil.
All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in the Communication and Confidentiality section of this policy.

Where the DSL is not available to discuss the concern, staff members will contact the deputy DSLs with the matter. If a referral is made about a pupil by anyone other than the DSL, the DSL will be informed as soon as possible.

The LA will make a decision regarding what action is required within one working day of the referral being made and will notify the referrer. Staff are required to monitor a referral if they do not receive information from the LA regarding what action is necessary for the pupil. If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the pupil.

If early help is appropriate, the case will be kept under constant review. If the pupil's situation does not improve, a referral will be considered. All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded on CPOMS.

If a pupil is in immediate danger, a referral will be made to CSCS and / or the police immediately. If a pupil has committed a crime, such as sexual violence, the police will be notified without delay.

Where there are safeguarding concerns, the school will ensure that the pupil's wishes are always taken into account, and that there are systems available for pupils to provide feedback and express their views. When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the pupil feels like they are being listened to and believed.

An inter-agency assessment will be undertaken where a child and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child and family require in preventing needs escalating to a point where intervention would be needed.

The school will consider whether a family group decision-making forum is appropriate to determine the help and support the family network can provide for a pupil where concerns have been raised about their safety or wellbeing.

17 MANAGING REFERRALS

The reporting and referral process outlined in the Reporting Safeguarding Concerns Flowchart will be followed accordingly.

All staff members, in particular the DSL, will be aware of the LA's arrangements in place for managing referrals. The DSL will provide staff members with clarity and support where needed. When making a referral to CSCS or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the pupils involved. The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

Where a pupil has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.
The school will not wait for the start or outcome of an investigation before protection the victim and other pupils: this applies to criminal investigations as well as those made by CSCS. Where CSCS decide that a statutory investigation is not appropriate, the school will consider referring the incident again if it is believed that the pupil is at risk of harm. Where CSCS decide that a statutory investigation is not

appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as early help and pastoral support.

At all stages of the reporting and referral process, the pupil will be informed of the decisions made, actions taken and reasons for doing so. Discussions of concerns with parents will only take place where this would not put the pupil or others at potential risk of harm. The school will work closely with parents to ensure that the pupil, as well as their family, understands the arrangements in place, such as in-school interventions, is effectively supported, and knows where they can access additional support.

18 STAFF PROCEDURES FOR REPORTING CONCERNS ABOUT STAFF CONDUCT

If you have any safeguarding concerns about an adult working in, or on behalf of the Trust, you must report it immediately to the headteachers. If your concern is about the headteacher, then you must report it to the Bronte CEO.

Any and all allegations and low-level concerns will be managed in line with Part four of KCSIE and associated Trust policies, e.g. Managing Allegations, Staff Code of Conduct and Acceptable Use. When dealing with allegations, we will:

- Apply common sense and judgement
- Deal with allegations quickly, fairly and consistently
- Provide effective protection for the child and support the person subject to the allegation

Whistleblowing – Anyone should feel able to raise concerns about poor or unsafe practice and potential failures in the school or Trust's safeguarding regimes and know that such concerns will be taken seriously by SLT. Appropriate whistle-blowing procedures, which are suitably reflected in staff training and policies, are in place in and across all Bronte Trust schools. These provide clear direction and enable any concerns to be raised appropriately.

Low-level concerns – The term does not mean that it is insignificant. A low-level concern is any concern – no matter how small, even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the Trust may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- Does not meet the harm threshold or is otherwise not serious enough to consider a referral to LADO

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

- Being over friendly with children
- Having favourites
- Taking photographs of children on their mobile phone or other personal electronic device, contrary to Trust policy
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

All staff must report Low Level Concerns to the Executive Headteacher the same day.
Please see the Bronte Academy Trust's Whistleblowing Policy for more information.

Allegations that may meet the harm threshold – Part Four of KCSIE should be followed where it is alleged that anyone working in school, including supply teachers, volunteers and contractors has:

- 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 above 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, advice will be sought from the Local Authority Designated Officer (LADO). This includes allegations pertaining to outside of school setting (OOSS) (KCSIE). In these cases, executive headteachers / head of schools must inform the Trust CEO immediately and follow the Managing Allegations Against Staff Policy.

All staff must report concerns about adult conduct immediately to the executive headteacher / head of school. If your concern is about the executive headteacher / head of school, then you must report it immediately to the CEO.

Where someone feels unable to raise an issue in school or with Bronte Academy Trust, or feels that their genuine concerns are not being addressed, other options are open to them:

Protect (formerly Public Concern at Work) (national charity offering whistle-blowing advice and support)
T: 020 3117 2520
E: whistle@protect-advice.org.uk

NSPCC Whistle-blowing helpline
T: 0800 028 0285
E: help@nspcc.org.uk

Ofsted
T: 0300 123 3155
https://www.gov.uk/complain-about-school?utm_source

Staff are expected to always follow the Trust Code of Conduct; this is available on the Trust website and will be shared during induction.

19 CONCERNS ABOUT SCHOOL SAFEGUARDING PRACTICES

Any concerns regarding the safeguarding practices at the school will be raised with the SLT, and the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy. If a staff member feels unable to raise an issue with the SLT, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

20 SAFEGUARDING CONCERNS AND ALLEGATIONS OF ABUSE AGAINST STAFF

All allegations against staff, supply staff, volunteers and contractors will be managed in line with the Trust's Allegations of Abuse Against Staff Policy. The school will ensure all allegations against staff,

including those who are not employees of the school, are dealt with appropriately and that the school liaises with the relevant parties.

When managing allegations against staff, the school will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as "low-level concerns", as defined in the Allegations of Abuse Against Staff Policy. Allegations that meet the harms threshold include instances where staff have:

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

21 COMMUNICATION AND CONFIDENTIALITY

When recording, holding, using and sharing information, the DSL will ensure that they:

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

All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with Trust Data Protection Polices.

Where there is an allegation or incident of sexual abuse or sexual violence, the victim is entitled to anonymity by law; therefore, the school will consult its policy and agree on what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the school will do all it can to protect the anonymity of the pupils involved in the case.

Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis. During the disclosure of a concern by a pupil, staff members will not promise the pupil confidentiality and will ensure that they are aware of what information will be shared, with whom and why.

Where it is in the public interest, and protects pupils from harm, information can be lawfully shared without the victim's consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime. Before doing so, the DSL will weigh the victim's wishes against their duty to protect the victim and others. Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.

Depending on the nature of a concern, the DSL will discuss the concern with the parents of the pupils involved. Discussions with parents will not take place where they could potentially put a pupil at risk of harm. Discussion with the victim's parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understand their wishes in terms of support arrangements and the progression of the report. Discussion with the alleged perpetrator's parents will have regards to the arrangements that

will impact their child, such as moving classes, with the reasons behind decisions being explained and the available support discussed. External agencies will be invited to these discussions where necessary.

Where confidentiality or anonymity has been breached, the school will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented.

Where a pupil is leaving the school, the DSL will consider whether it is appropriate to share any information with the pupil's new provider, in addition to the child protection file, that will allow the new provider to support the pupil and arrange appropriate support for their arrival.

22 SAFER RECRUITMENT

The Trust's full policy and procedures for safer recruitment are outlined in the Safer Recruitment Policy.

An enhanced DBS check with barred list information will be undertaken for all staff members.

The DfE's DBS Workforce Guides will be consulted when determining whether a position fits the child workforce criteria.

The school will conduct the appropriate pre-employment checks for all prospective employees, including internal candidates and candidates who have lived or worked outside the UK.

The appropriate DBS and suitability checks will be carried out for all governors, volunteers and contractors.

Staff Suitability

All centres providing care for pupils under the age of eight, must ensure that staff and volunteers working in these settings are not disqualified from doing so under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018. A person may be disqualified if they:

- Have certain orders or other restrictions placed upon them
- Have committed certain offences

All staff members are required to sign the Staff Disqualification Declaration Form confirming that they are not disqualified from working in a schooling environment. A disqualified person will not be permitted to continue working at the school, unless they apply for and are granted a waiver from Ofsted. The school will provide support with this process.

Ongoing suitability

Following appointment, consideration will be given to staff and volunteers' ongoing suitability – to prevent the opportunity for harm to children or placing children at risk.

Referral to the DBS

The school will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence.

23 SINGLE CENTRAL RECORD (SCR)

The school keeps a SCR which records all staff, including agency and third-party supply staff, and teacher trainees on salaried routes, who work at the school.

All members of the proprietor body are also recorded on the SCR.

The Trust holds a SCR for the central team.

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DDBS check
- A prohibition from teaching check
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- A section 128 check for those in management positions

For agency and third-party supply staff, the school will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that all the necessary checks have been conducted (i.e. all the same checks the school would perform on any individual working in the school or who will be providing education on the school's behalf, including through online delivery) and the date that the "letter of assurance" was received.
All checks that are conducted for volunteers, will also be recorded on the SCR. Risk assessments are conducted for all volunteers.

The school is free to record any other information it deems relevant.

The details of an individual will be removed from the SCR once they no longer work at the school.

24 TRAINING

Staff members will undergo safeguarding and child protection training at induction, which will be updated annually and / or whenever there is a change in legislation.

The induction training will cover:

- The Child Protection and Safeguarding Policy
- The Staff Code of Conduct
- Part one of 'Keeping children safe in education' (KCSIE) (or Annex A, if appropriate)
- The Behaviour Policy
- The Children Missing from Education Policy, including the safeguarding response to children who are absent from education
- Appropriate child protection and safeguarding training, including online safety training – which, amongst other things, includes an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring
- Information about the role and identity of the DSL and deputy DSLs

All staff members will receive safeguarding and child protection updates as required, but at least annually. Training will cover, at a minimum:

- The issues surrounding sexual violence and sexual harassment
- Contextual safeguarding
- How to keep LAC and PLAC safe
- CCE and the need to refer cases to the National Referral Mechanism

- Updated online safety training

Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the school.

The DSL and deputy DSLs will undergo child protection and safeguarding training, and update this training at least every two years. The DSL and deputy DSLs will also obtain access to resources and attend any relevant or refresher training courses, ensuring they keep up-to-date with any developments relevant to their role. This will include training to understand:

- The assessment process for providing early help and statutory intervention, including local criteria for action and CSCS referral arrangements
- How LAs conduct child protection case conferences and a child protection review, to enable the DSL to attend and contribute to these effectively when required
- The importance of providing information and support to CSCS
- How to be alert to the specific needs of children in need, pupils with SEND and / or relevant health conditions, and young carers
- The importance of internal and external information sharing
- The Prevent Duty
- The risks associated with online safety, including the additional risks faced online by pupils with SEND

25 MONITORING AND REVIEW

Declaration of Responsibility

This Child Protection and Safeguarding Policy was reviewed and formally adopted by the Lees AGC on

.....1 Sep 26 .....Date

.....Signed Chair of Governors

....Signed Executive Headteacher

Appendix 1

Specific Safeguarding Issues

This appendix sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues.

1. Domestic abuse
2. Homelessness
3. Children absent from education
4. Child abduction and community safety incidents
5. Child criminal exploitation (CCE)
6. Cyber-crime
7. Child sexual exploitation (CSE)
8. Modern slavery
9. FGM
10. Virginity testing and hymenoplasty
11. Forced marriage
12. Radicalisation
13. Pupils with family members in prison
14. Pupils required to give evidence in court
15. Mental health
16. Serious violence
17. Adult involvement in youth-produced sexual imagery

Domestic abuse

For the purposes of this policy, and in line with the Domestic Abuse Act 2021, **"domestic abuse"** is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person's child) where both are aged 16 or over and are personally connected. **"Abusive behaviour"** includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse. **"Personally connected"** includes people who:

- Are, have been, or have agreed to be married to each other.
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other.
- Each have, or had, a parental relationship towards the same child.
- Are relatives.

The school will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

Homelessness

The DSL and deputy DSLs will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.
Indicators that a family may be at risk of homelessness include:

- Household debt.
- Rent arrears.
- Domestic abuse.
- Anti-social behaviour.
- Any mention of a family moving home because "they have to".

Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSCS will be made as necessary where concerns are raised.

Children absent from education

A child who is absent from school can be a vital warning sign of a range of safeguarding issues, including neglect, CSE and CCE, particularly county lines. The school will ensure that the response to children persistently being absent from education supports identifying such abuse and helps prevent the risk of pupils becoming absent from education in the future. Staff will monitor pupils that are absent from the school, particularly on repeat occasions and/or prolonged periods, and report them to the DSL following normal safeguarding procedures, in accordance with the Children Missing from Education Policy. The school will inform the LA of any pupil who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more.

The school will follow the DfE's guidance on improving attendance where there is a need to work with children's services due to school absences indicating safeguarding concerns.

Admissions register

Pupils are placed on the admissions register at the beginning of the first day that is agreed by the school, or when the school has been notified that the pupil will first be attending. The school will notify the LA within 5 days of when a pupil's name is added to the admissions register.

The school will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur. Two emergency contacts will be held for each pupil where possible. Staff will monitor pupils who do not attend the school on the agreed date and will notify the LA at the earliest opportunity.

If a parent notifies the school that their child will live at a different address, the school will record the following information on the admissions register:

- The full name of the parent with whom the pupil will live
- The new address
- The date from when the pupil will live at that address

If a parent notifies the school that their child will be attending a different school, or is already registered at a different school, the following information will be recorded on the admissions register:

- The name of the new school
- The date on which the pupil first attended, or is due to attend, that school
-

Where a pupil moves to a new school, the school will use a secure internet system to securely transfer pupils' data.

To ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any pupil who is going to be deleted from the admission register, in accordance with the Education (Pupil Registration) (England) Regulations 2006 (as amended), where they:

- Have been taken out of the school by their parents, and are being educated outside the national education system, e.g. home education.
- Have ceased to attend the school, and no longer live within a reasonable distance of the premises.
- Have been certified by the school's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention to the pupil continuing to attend school after ceasing to be of compulsory school age.

- Have been in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of that period.
- Have been permanently excluded.

The school will also remove a pupil from the admissions register where the school and LA has been unable to establish the pupil's whereabouts after making reasonable enquiries into their attendance.

If a pupil is to be removed from the admissions register, the school will provide the LA with the following information:

- The full name of the pupil
- The full name and address of any parent with whom the pupil lives
- At least one telephone number of the parent with whom the pupil lives
- The full name and address of the parent with whom the pupil is going to live, and the date that the pupil will start living there, if applicable
- The name of the pupil's new school and the pupil's expected start date there, if applicable
- The grounds for removal from the admissions register under regulation 8 of the Education (Pupil Registration) (England) Regulations 2006 (as amended)

The school will work with the LA to establish methods of making returns for pupils back into the school. The school will highlight to the LA where they have been unable to obtain necessary information from parents, e.g. where an address is unknown. The school will also highlight any other necessary contextual information, including safeguarding concerns.

Child abduction and community safety incidents

For the purposes of this policy, **"child abduction"** is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of the school that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with pupils.

Pupils will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

Child criminal exploitation (CCE)

For the purposes of this policy, **"child criminal exploitation"** is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

The school will recognise that pupils involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. The school will also recognise that pupils of any gender are at risk of CCE.

School staff will be aware of the indicators that a pupil is the victim of CCE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from school or education or not taking part.

County lines

For the purposes of this policy, **"county lines"** refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

As well as the general indicators for CCE, school staff will be aware of the specific indicators that a pupil may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.
- Being exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owing a 'debt bond' to their exploiters.
- Having their bank account used to facilitate drug dealing.
-

Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a pupil may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

Cyber-crime

For the purposes of this policy, **"cyber-crime"** is defined as criminal activity committed using computers and/or the internet. This includes 'cyber-enabled' crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and 'cyber-dependent' crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as 'hacking'.
- Denial of Service attacks, known as 'booting'.
- Making, supplying or obtaining malicious software, or 'malware', e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring pupils to the National Crime Agency's Cyber Choices programme.

Child sexual exploitation (CSE)

For the purposes of this policy, **"child sexual exploitation"** is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

The school will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the pupil's immediate knowledge, e.g. through others sharing videos or images of them on social media. The school will recognise that CSE can affect any pupil who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16 and above who can legally consent to sexual activity. The school will also recognise that pupils may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

School staff will be aware of the key indicators that a pupil is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from school or education or not taking part.
- Having older partners.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the LA. The LA and all other necessary authorities will then handle the matter to conclusion. The school will cooperate as needed.

Modern slavery

For the purposes of this policy, **"modern slavery"** encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

FGM

For the purposes of this policy, **"FGM"** is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

All staff will be alert to the possibility of a pupil being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSCS and/or the police. The school's procedures relating to managing cases of FGM and protecting pupils will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any

such case with the DSL and involve CSCS as appropriate. **NB:** This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

All staff will be aware of the indicators that pupils may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the pupil. It is important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a pupil may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family and their level of integration into UK society.
- The pupil coming from a community known to adopt FGM.
- Any girl with a mother or sister who has been subjected to FGM.
- Any girl withdrawn from PSHE.

Indicators that FGM may take place soon include:

- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a 'special procedure' or a ceremony to 'become a woman'.
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.
- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin. Indicators that FGM may have already taken place include the pupil:

- Having difficulty walking, sitting or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from school, followed by withdrawal or depression.
- Being reluctant to undergo normal medical examinations.
- Asking for help, but not being explicit about the problem due to embarrassment or fear.

FGM is included in the definition of so-called **"'honour-based' abuse (HBA)"**, which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

Virginity testing and hymenoplasty

Under the Health and Care Act 2022, it is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK. It is also illegal for UK nationals and residents to do these things outside the UK.

Virginity testing - Also known as hymen, '2-finger' or vaginal examination, this is defined as any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place. This is irrespective of whether consent has been given. Vaginal examination has no established scientific merit or clinical indication.

Hymenoplasty - A procedure which can involve a number of different techniques, but typically involving stitching or surgery, undertaken to reconstruct a hymen with the intent that the person bleeds the next time they have vaginal intercourse. Hymenoplasty is different to procedures that may be performed for clinical reasons, e.g. surgery to address discomfort or menstrual complications.

Virginity testing and hymenoplasty are forms of violence against women and girls and are part of the cycle of HBA, and can be precursors to child or forced marriage and other forms of family and/or community coercive behaviours, including physical and emotional control. Victims are pressurised into undergoing these procedures, often by family members or their intended husbands' family to fulfil the requirement that a woman remains 'pure' before marriage. Those who 'fail' to meet this requirement are likely to suffer further abuse, including emotional and physical abuse, disownment and even honour killings.

The procedures are degrading and intrusive, and can result in extreme psychological trauma, provoking conditions such as anxiety, depression and PTSD, as well as physical harm and medical complications. Staff will be alert to the possible presence of stress, anxiety and other psychological or behavioural signs, and mental health support should be made available where appropriate.

Victims face barriers in coming forward, e.g. they may not know that the abuse was abnormal or wrong at the time, and may feel shameful, having been taught that speaking out against family and/or the community is wrong, or being scared about the repercussions of speaking out. The school will educate pupils about the harms of these practices and dispel myths, e.g. the belief that virginity determines the worth of a woman, and establish an environment where pupils feel safe enough to make a disclosure.

Pupils aged 13 and older are considered to be most at risk, but it can affect those as young as 8, and anyone with female genitalia can be a victim regardless of age, gender identity, ethnicity, sexuality, religion, disability or socioeconomic status. All staff will be aware of the following indicators that a pupil is at risk of or has been subjected to a virginity test and/or hymenoplasty:

- A pupil is known to have requested either procedure or asks for help
- Family members disclose that the pupil has already undergone the practices
- Pain and discomfort after the procedures, e.g. difficulty in walking or sitting for a long period of time which was not a problem previously
- Concern from family members that the pupil is in a relationship, or plans for them to be married
- A close relative has been threatened with either procedure or has already been subjected to one
- A pupil has already experienced or is at risk of other forms of HBA
- A pupil is already known to social services in relation to other safeguarding issues
- A pupil discloses other concerns that could be an indication of abuse, e.g. they may state that they do not feel safe at home, that family members will not let them out the house and/or that family members are controlling
- A pupil displays signs of trauma and an increase in emotional and psychological needs, e.g. withdrawal, anxiety, depression, or significant change in behaviour
- A pupil appears fearful of their family or a particular family member
- Unexplained absence from school, potentially to go abroad
- Changes in behaviour, e.g. a deterioration in schoolwork, attendance, or attainment

The above list is not exhaustive, but if any of these indicators are identified, staff members will immediately raise concerns with the DSL. An assessment of the risk they face will be undertaken. If there is believed to be immediate danger, the police will be contacted without delay.
The school will not involve families and community members in cases involving virginity testing and hymenoplasty, including trying to mediate with family or using a community member as an interpreter, as this may increase the risk of harm to the pupil, including expediting arrangements for the procedure.

Forced marriage

Forced marriage is a crime. It is a form of abuse directed towards a child or vulnerable adult, including adults who are forced into marriage against their free will.

Forced marriage is a marriage where one or both spouses do not consent to the marriage but are coerced into it. Force can be physical, psychological, financial, sexual and emotional pressure. Forced marriage can be committed if a person lacks capacity, whether or not coercion plays a part.

Under the Anti-social Behaviour, Crime and Policing Act 2014 a person commits an offence if he or she uses violence, threats or any other form of coercion for the purpose of causing another person to enter into a marriage and believes, or ought reasonably to believe, that the conduct may cause the other person to enter into the marriage without free and full consent.

It is an offence to do anything intended to cause a child to marry before the child's eighteenth birthday, whether or not the conduct amounts to violence, threats, or any other form of coercion or deception. This applies to non-binding, unofficial 'marriages' as well as legal marriages.

All staff will be alert to the indicators that a pupil is at risk of, or has undergone, forced marriage, including, but not limited to, the pupil:

- Being absent from school – particularly where this is persistent.
- Requesting for extended leave of absence and failure to return from visits to country of origin.
- Being fearful about forthcoming school holidays.
- Being subjected to surveillance by siblings or cousins at school.
- Demonstrating a decline in behaviour, engagement, performance, exam results or punctuality.
- Being withdrawn from school by their parents.
- Being removed from a day centre when they have a physical or learning disability.
- Not being allowed to attend extracurricular activities.
- Suddenly announcing that they are engaged to a stranger, e.g. to friends or on social media.
- Having a family history of forced marriage, e.g. their older siblings have been forced to marry.
- Being prevented from going on to further or higher education.
- Showing signs of mental health disorders and behaviours, e.g. depression, self-harm, anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.

Staff who have any concerns regarding a pupil who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL or headteacher and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit. The DSL or headteacher will ensure the pupil is spoken to privately about these concerns and further action taken as appropriate. Pupils will always be listened to and have their comments taken seriously.

It will be made clear to staff members that they should not approach the pupil's family or those with influence in the community, without the express consent of the pupil, as this will alert them to the concerns and may place the pupil in further danger.

Advice will be sought from the Forced Marriage Unit following any suspicion of forced marriage among pupils.

If a pupil is being forced to marry, or is fearful of being forced to, the school will be especially vigilant for signs of mental health disorders and self-harm. The pupil will be supported by the DSL and senior mental health lead and referrals will be made on a case-by-case basis.

Staff members will make themselves aware of how they can support victims of forced marriage in order to respond to the victims needs at an early stage, and be aware of the practical help they can offer, e.g. referral to social services and local and national support groups.

Local child safeguarding procedures will be activated following concerns regarding forced marriage – the school will use existing national and local protocols for multi-agency liaison with police and children's social care.

The school will support any victims to seek help by:

- Making them aware of their rights and choices to seek legal advice and representation.
- Recording injuries and making referrals for medical examination where necessary.
- Providing personal safety advice.
- Developing a safety plan in case they are seen, e.g. by preparing another reason for why the victim is seeking help.

The school will establish where possible whether pupils at risk of forced marriage have a dual nationality or two passports.

The school will aim to create an open environment where pupils feel comfortable and safe to discuss the problems they are facing – this means creating an environment where forced marriage is discussed openly within the curriculum and support and counselling are provided routinely.

The school will take a whole school approach towards educating on forced marriage in the school curriculum and environment – in particular, the school's RSHE curriculum will incorporate teaching about the signs of forced marriage and how to obtain help. Appropriate materials and sources of further support will be signposted to pupils. Pupils will be encouraged to access appropriate advice, information and support.

Teachers and other staff members will be educated through CPD about the issues surrounding forced marriage and the signs to look out for.

Radicalisation

For the purposes of this policy, **"radicalisation"** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

For the purposes of this policy, **"extremism"** refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces.

For the purposes of this policy, **"terrorism"** refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public, and be made for the purpose of advancing a political, religious or ideological cause.

Protecting pupils from the risk of radicalisation is part of the school's wider safeguarding duties. The school will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in pupils' behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify pupils who may be susceptible to extremist ideologies and radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. The school will work with local safeguarding arrangements as appropriate.

The school will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the pupil's parents, unless the school has reason to believe that the child would be placed at risk as a result.

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect pupils against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

The Prevent duty

Under section 26 of the Counter-Terrorism and Security Act 2015, all schools are subject to a duty to have "due regard to the need to prevent people from being drawn into terrorism", known as **"the Prevent duty"**. The Prevent duty will form part of the school's wider safeguarding obligations.

Pupils with family members in prison

Pupils with a family member in prison will be offered pastoral support as necessary. They will receive a copy of 'Are you a young person with a family member in prison?' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

Pupils required to give evidence in court

Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

[Primary schools only] Pupils will be provided with the booklet 'Going to Court' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

Mental health

All staff will be made aware that mental health problems can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Staff will not attempt to make a diagnosis of mental health problems – the school will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify pupils whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how pupils' experiences can impact on their mental health, behaviour, and education.

Staff who have a mental health concern about a pupil that is also a safeguarding concern will act in line with this policy and speak to the DSL or deputy DSLs.

The school will access a range of advice to help them identify pupils in need of additional mental health support, including working with external agencies.

In all cases of mental health difficulties, the school's Social, Emotional and Mental Health (SEMH) Policy will be consulted and adhered to at all times.

Serious violence

Through training, all staff will be made aware of the indicators which may signal a pupil is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- Increased absence from school.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.

- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a pupil's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

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

Staff members who suspect a pupil may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

The school will cooperate with core duty holders when asked and ensure arrangements are in place to do so.

Sexually motivated incidents

The school will remain aware that not all instances of Youth Produced Sexual Imagery (YPSI) will be between children and young people, and in some cases may involve adults posing as a child for the purpose of obtaining nude and semi-nude images from persons under 18.

Staff will be aware of the signs that an adult is involved in the sharing the nude or semi-nude images. These include:

- Being contacted by an online account they do not know but appears to be from somebody under the age of 18.
- Quickly being engaged in sexually explicit communications.
- The offender sharing unsolicited sexual images.
- The conversation being moved from a public to a private and/or encrypted platform.
- Being coerced or pressured into doing sexual things, including producing sexual imagery.
- Being offered money or gifts.
- Being threatened or blackmailed into sharing nude or semi-nude images, and/or further sexual activity.

Financially motivated incidents

Financially motivated incidents of YPSI involving adults may also be called **"sextortion"**, where the offender threatens to release nudes or semi-nudes of a child or young person unless they do something to prevent it, e.g. paying money. In these cases, offenders often pose as children and:

- Groom or coerce the victim into sending nudes or semi-nudes in order to blackmail them.
- Use images that have been stolen from the child or young person, e.g. via hacking.
- Use digitally manipulated and/or AI-generated images of the child or young person.

Staff will be aware of the signs of sextortion, which include:

- Being contacted by an online account they do not know but appears to be from somebody under the age of 18.
- Quickly being engaged in sexually explicit communications.
- The offender sharing sexual images first.
- The conversation being moved from a public to a private and/or encrypted platform.
- Told their online accounts have been hacked in order to obtain images, personal information, and contacts.

- Being blackmailed into sending money or sharing bank account details.
- Being shown stolen or digitally manipulated/generated images of the victim.

Appendix 2

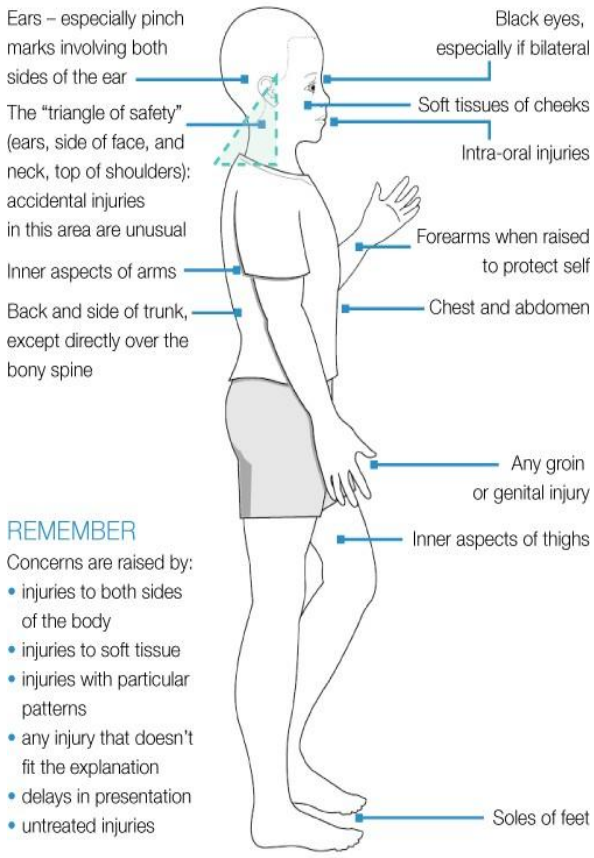
Categories of abuse, signs and indicators

There are myriad potential indicators, physical, emotional and / or behavioural. Some are quite generic and apply to more than one form of abuse while others are more contextually specific. Similarly, potential indicators might vary considerably from person to person, depending on their experience(s), circumstances and capacities

Physical Abuse

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

Physical Marks and Injuries - things to be mindful of



Marks and Bruising

- Marks or bruising or injuries on children who are not independently mobile
- Multiple or clusters of bruises - these are a common feature in abused children, as are those that are uniform in shape, symmetrical or in parallel, e.g. straight lines, on opposite sides
- In cases of physical abuse, the head and face are the areas of the body most commonly injured
- Injuries to the lips - the most common recorded abusive injury to the mouth
- Bruising on the forearm, face, ears, abdomen, hip, upper arm, back of the leg, hands or feet - may have been sustained when children were trying to defend themselves
- Non accidental injuries (NAIs) may carry the imprint of an implement, cord or hand
- Severe bruising to the scalp, with swelling around the eyes and no skull fracture, may occur if the child has been "scalped" – i.e. had their hair pulled violently
- Bruises or marks in fleshy areas / away from bony prominences, especially to the face, back, abdomen, arms, buttocks, ears and hands
- Petechiae (dots of blood under the skin) around them are less common in accidental injuries
- Intentional immersion scalds usually affect the lower limbs (with or without the buttocks or perineum - bit of skin between genitals and anus). They may also affect both arms and/or both legs like a 'glove' or 'sock'. Characteristically, non-accidental injuries might have a clear upper limit to the scalded skin area which is of uniform depth

- Burns can sometimes be deliberately inflicted as part of a cultural belief or traditional remedy, e.g. moxibustion - burning the moxa herb under a glass over the part of the body affected; 'cupping' - causes superficial circular burns, usually on the back

Burns and Scolds

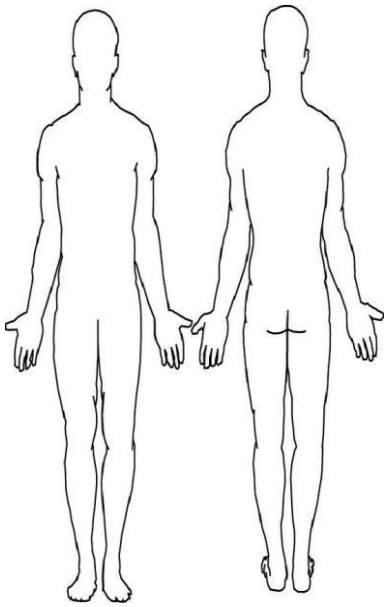
- Intentional immersion scalds usually affect the lower limbs (with or without the buttocks or perineum - bit of skin between genitals and anus). They may also affect both arms and/or both legs like a 'glove' or 'sock'. Characteristically, non-accidental injuries might have a clear upper limit to the scalded skin area which is of uniform depth
- Burns can sometimes be deliberately inflicted as part of a cultural belief or traditional remedy, e.g. moxibustion - burning the moxa herb under a glass over the part of the body affected; 'cupping' - causes superficial circular burns, usually on the back

Bites

- Where an adult bites a child sufficiently hard to leave a mark, it is an assault. A bite leaves an oval or circular mark, consisting of two symmetrical, opposing, u-shaped arches separated by an open space. The arcs may include puncture wounds, indentations or bruising.

Recording Using Skin / Body Maps

Marks and injuries fade, disappear and change colour or shape at different rates on different people. It is imperative that a fit-for-purpose record is made by the person who notices a mark or injury and that the DSL is notified without delay, that same day. These should be recorded using the Body Map on CPOMs



Record the following in respect of each mark identified

Exact site of injury on the body, e.g. upper outer arm/left cheek;

Size of injury - in appropriate centimetres or inches;

Approximate shape of injury, e.g. round/square or straight line;

Colour of injury - if more than one colour, say so;

Is the skin broken?

Is there any swelling at the site of the injury, or elsewhere?

Is there a scab/any blistering/any bleeding?

Is the injury clean or is there grit/fluff etc?

Is mobility restricted as a result of the injury?

Does the site of the injury feel hot / does the child feel hot / in pain?

Has the child's body shape changed?

Are they holding themselves differently?

X **Do NOT** remove clothing unless the site of the injury is available because of treatment; X

DO NOT try to explain what you think caused the marks;

X **Do NOT** take photographs

X **Never** in pencil and **do not** use correction fluid or any other eraser

Staff recognise any potential indicators of physical abuse. Staff who notice a mark or injury must make a fit-for-purpose record of this and report it to the DSL without delay and that same day.

Any marks or injuries should be recorded using the Body Map on CPOMS.

Emotional Abuse

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

Trauma, Mental Health-related and Emotional / Behaviour Indicators

Our staff access training appropriate to their roles and responsibilities, including around attachments, child development, mental health and trauma. We know that where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

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. We have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems. While we are conscious that only appropriately trained professionals should attempt to make a diagnosis, staff remain 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 staff have a mental health concern about a child that is also a safeguarding concern. Immediate action will be taken in line with this policy and safeguarding procedures, i.e. **any and all concerns around mental health will be reported to the DSL without delay.**

Staff recognise any potential indicators of emotional abuse. Staff who have concerns about a child's mental health or emotional wellbeing must report these to the DSL without delay.

Sexual Abuse:

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

Staff recognise any potential indicators of sexual abuse. Staff must report any concerns about sexual abuse to the DSL without delay.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, 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.

Staff recognise any potential indicators of neglect. Staff must report any concerns about neglect to the DSL without delay.

DSL's will:

- familiarise themselves with local tools and models for assessing and responding to child neglect
- regularly review concerns about neglect and give consideration to a referral to local authority children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse.
- be mindful of the need to convey that picture and the child's daily lived experience in referral and other multi-agency processes
- will be well informed and robust when it comes to thresholds, planning and review decisions, questioning, challenging and escalating as appropriate.

Appendix 3

CME, EHE and AP

We adopt a pro-active and robust approach to promote good attendance and punctuality. For example:

- Whole school approach and everyone's responsibility

- Clear and regular messaging about our high expectations
- Supporting pupils and parents to address causes wherever possible and to stop things from *becoming* problematic
- Planned, supported and tracked transitions into EYFS and to Secondary School
- Robust and compliant maintenance of registers
- Prompt and robust first responses to none attendance, including having more than one contact number for each pupil as this gives us additional options to make contact with a responsible adult when a child does not attend school, is missing education and / or where there is a welfare and/or safeguarding concern
- Conducting home visits where necessary
- Attendance Panels and Plans where attendance is too low
- Working closely with the LA, e.g. APSOs
- Monitoring, analysing and tracking data so we understand and can respond to patterns and challenges and gauge the impact of our interventions

We are clear that children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines.

Our response to persistent absence and children missing from education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

In line with the DfE's Working Together to Improve School Attendance guidance, we monitor the attendance of vulnerable pupils particularly closely, e.g. pupils:

- With lower attendance than their peers
- At risk of becoming persistently absent
- persistently absent
- severely absent
- with medical conditions or SEND with poor attendance
- with a social worker
- about whom there are existing safeguarding or welfare concerns

Where we are concerned, we will continue to:

- ensure that we liaise and work effectively with partner agencies
- notify and refer to them formally, in line with local protocols and procedures, e.g. where any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more
- put in place and regularly review risk assessments for individual pupils - *see example over*
- check to ensure the suitability and effectiveness of and attendance at any alternative provision

Elective Home Education (EHE)

Schools must inform their LA of all deletions from their admission register when a child is taken off roll. We comply with the guidance.

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, we will work together with the local authority and other key professionals to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child.

This is particularly important where a child has SEND, is vulnerable, and/or has a social worker and we will work closely with the local authority to ensure that any assessments and plans are reviewed, in consultation with parents and carers.

We also acknowledge that there is no proven correlation between home education and safeguarding risk. Moreover, some parents who educate at home believe that by doing so, they are safeguarding the child from risk in the school system.

However, a child being educated at home is not necessarily being seen on a regular basis by professionals and this logically increases the chances that any parents who set out to use home education to avoid independent oversight may be more successful by doing so.

Child Safeguarding Practice Reviews have illustrated this in recent years. We will take all necessary steps to safeguard and promote the welfare of any children about whom we have concerns in this context.

Children Attending Alternative Provision

We are also mindful of the fact that children accessing alternative provision might, potentially, be especially vulnerable to abuse and exploitation. Where a pupil attends alternative provision, we retain responsibility for the safeguarding of that pupil, and will always satisfy ourselves that the provider meets the needs of the pupil. To this end, we will obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of our own staff.

We retain overall responsibility for pupils on our roll. Consequently, in-line with KCSIE, we:

- agree at placement meetings what will happen if a pupil does not attend
- ensure that our DSL monitors those children and young people especially closely
- communicate on a regular basis (at least half termly) with providers in order to gauge and monitor attendance, progress and effectiveness.

Appendix 4

Radicalisation – what research tells us to be mindful of

Vulnerability	Online	On the Ground
Almost all children and young people referred as at risk of radicalisation are young men Commonly identified vulnerabilities include: looking for connection and struggling with social relationships sense of belonging (i.e. wanting to be needed, seeking a group. Distinct from, but often linked to, social isolation) low confidence / self esteem mental health problems autism (with children and young people being more vulnerable to developing fixations and finding it more difficult to shift their viewpoints) - other learning needs (such as communication and language difficulties, Attention Deficit Hyperactivity Disorder (ADHD), or Obsessive-compulsive Disorder (OCD)) neglect past trauma including exposure to domestic abuse	Particularly associated with radicalisation to Extreme Right-Wing and mixed/unclear ideologies Exacerbated where parents have an insufficient understanding of the risks and threats linked to online platforms Children being groomed or radicalised through online discussion forums social media platforms or online games acting as introductory spaces Online influences became more significant during the COVID-19 pandemic – more time online, increased isolation exacerbated some underlying vulnerabilities	Increase in referrals relation to Extreme Right-Wing ideology coincided with international or local events, such as local activity by Extreme Right-Wing political parties, elections and referendums, and local immigration Familial influences remained important in relation to Islamist extremist and Extreme Right-Wing ideologies

Risk Indicators

Indicators of an identity crisis:

- Distancing themselves from their cultural/religious heritage
- Uncomfortable with their place in society

Indicators of a personal crisis including the following:

- Family tensions
- A sense of isolation
- Low self-esteem
- Disassociation from existing friendship groups
- Searching for answers to questions about identify, faith and belonging

Indicators of vulnerability through personal circumstances:

- Migration
- Local community tensions
- Events affecting their country or region of origin
- Alienation from UK values
- A sense of grievance triggered by personal experience of racism or discrimination

Indicators of vulnerability through unmet aspirations:

- Perceptions of injustice
- Feelings of failure
- Rejection of civic life

Indicators of vulnerability through criminality:

- Experiences of dealing with the police
- Involvement with criminal groups

Making a judgement

When making a judgement, staff will ask themselves the following questions:

- Does the pupil have access to extremist influences?
- Does the pupil access the internet for the purposes of extremist activities (e.g. using closed network groups, accessing or distributing extremist material, contacting covertly using Skype)?
- Is there a reason to believe that the pupil has been, or is likely to be, involved with extremist organisations?
- Is the pupil known to have possessed, or be actively seeking, extremist literature/other media likely to incite racial or religious hatred?
- Does the pupil sympathise with or support illegal/illicit groups?
- Does the pupil support groups with links to extremist activity?
- Has the pupil encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political or religious influence on the pupil?
- Have international events in areas of conflict and civil unrest had a noticeable impact on the pupil?
- Has there been a significant shift in the pupil's outward appearance that suggests a new social, political or religious influence?
- Has the pupil come into conflict with family over religious beliefs, lifestyle or dress choices?
- Does the pupil vocally support terrorist attacks; either verbally or in their written work?
- Has the pupil witnessed or been the victim of racial or religious hate crime?
- Is there a pattern of regular or extended travel within the UK?
- Has the pupil travelled for extended periods of time to international locations?
- Has the pupil employed any methods to disguise their identity?
- Does the pupil have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the pupil display a lack of affinity or understanding for others?
- Is the pupil the victim of social isolation?
- Does the pupil demonstrate a simplistic or flawed understanding of religion or politics?
- Is the pupil a foreign national or refugee, or awaiting a decision on their/their family's immigration status?
- Does the pupil have insecure, conflicted or absent family relationships?
- Has the pupil experienced any trauma in their lives, particularly trauma associated with war or sectarian conflict?
- Is there evidence that a significant adult or other person in the pupil's life has extremist views or sympathies

Critical indicators include where the pupil is:

- In contact with extremist recruiters.
- Articulating support for extremist causes or leaders.
- Accessing extremist websites.
- Possessing extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining extremist organisations.
- Making significant changes to their appearance and/or behaviour.

Appendix 5

Child on Child Abuse including Sexual Violence, Sexual Harassment and Harmful Sexual Behaviours

Some children and young people may be at increased risk of exposure to, or of developing, unhealthy sexual behaviours. These include children and young people who have a disability, have been abused, or have experienced other disruptions to their development or socialisation. When children display sexual behaviour which increases their vulnerability or causes harm to someone else, **staff have a responsibility to provide support and protection.**

Knowing how to distinguish healthy and harmful sexual behaviour in children helps in both supporting the development of healthy sexuality and in the protection of children from harm or abuse. Harmful Sexual Behaviour (HSB) can occur online and/or face to face and can also occur simultaneously between the two. HSB should be considered in a child protection context.

SWGFL HSB Resources for Schools

What's healthy and what's not?

Safe and healthy



Behaviours are:	**Behaviours are:**	**Behaviours are:**
Displayed between children or young people of similar age.	unusual for that particular child or young person	Excessive secretive compulsive coercive, degrading or threatening
Reflective of natural curiosity, experimentation, consensual activities and positive choices.	of potential concern due to age or developmental differences.	Involve significant age, developmental, or power differences.

Many expressions of 'sexual' behaviour may not be primarily sexual in nature. Those that are may themselves be part of healthy development and give no cause for concern.
Factors which can influence such behaviour are known to include:

- sexual excitement or curiosity
- sensory issues;
- lack of sex and relationships information / education
- lack of privacy
- boredom, loneliness, anxiety, confusion or depression
- family/carer conflict
- lack of appropriate models / boundaries
- trauma inc. emotional, physical, sexual abuse and neglect
- communication / sensory difficulties
- attachment / relationship needs / issues
- gender, masculinity and / or identity issues
- copying the behaviour of others / behaviour seen on the internet or TV.

Research suggests that a very significant proportion of child sexual abuse is committed by someone under the age of 18. Sexual behaviour between children is also considered harmful if one of the children is much older – particularly if there is more than two years' difference in age or if one of the children is pre-pubescent and the other isn't. However, a younger child can abuse an older child, particularly if they have power over them, greater capacity etc.

Research also tells us that children and young people who harm others sexually are more likely to:

- have poor self-regulation and coping skills
- experience social anxiety and a sense of social inadequacy
- have less well developed and internalised rules for social behaviour
- possess a poorly developed or primitive sense of morality
- lack secure and confident attachments to others
- exercise limited self-control, and act out their emotional experiences through negative or otherwise inappropriate behaviour
- Have little insight into the feelings and needs of others and, indeed, their own mental states
- Place their own needs and feelings ahead of the needs and feelings of others
- Exhibit a poorly defined sense of personal boundaries
- Have developed strong and not easily corrected cognitive distortions about others, themselves, and the world they share
- Have deficits in social skills and in social competence overall.

Normal	Inappropriate	Problematic	Abusive	Violent
Developmentally expected Socially acceptable Consensual, mutual, reciprocal Shared decision making	Single instances of inappropriate sexual behaviour Socially acceptable behaviour within peer group Context for behaviour may be inappropriate Generally consensual and reciprocal	Problematic and concerning behaviour Developmentally unusual and socially unexpected No overt elements of victimisation Consent issues may be unclear May lack reciprocity or equal power May include levels of compulsivity	Victimising intent or outcome Includes misuse of power Coercion and force to ensure victim compliance Intrusive Informed consent lacking or not able to be freely given by victim May include elements of expressive violence	Physically violent sexual abuse Highly intrusive Instrumental violence that is psychologically and/or sexually arousing to the perpetrator Sadism

Ref: S, Hackett

***It is important to understand and assess overlap, not least the 'line' between harassment and violence and when it may have been crossed.**

Central Tenets of Our Approach

- Our **whole school** approach means that **all relevant and associated policies** and procedures are clear, consistent, up-to-date and embedded, e.g. online safety, promoting positive behaviour; measures to prevent all forms of bullying (including cyber-bullying, prejudice based and discriminatory bullying).

- Our culture, policies and procedures seek minimise the risk of child-on-child abuse. The systems we have in place are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously.
- We adopt a **zero-tolerance** approach. Worrying or unacceptable behaviour is never acceptable and will never be passed off as “banter”, “just having a laugh”, “part of growing up” or “boys being boys”. We recognise that this can lead to a culture of unacceptable behaviours and an unsafe environment for children. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.
- We comply with statutory guidance on **Relationships and Sex Education**. In so doing, we seek to put in place the key building blocks of healthy, respectful relationships, focusing on family and friendships, in all contexts, including online. This sits alongside the essential understanding of how to be healthy.
- We are a 'listening school' and seek to empower children by **breaking down barriers and giving them a voice**. We build appropriate, nurturing relationships via which staff act as positive role models at all times and have systems in place via which children can express / report any worries or concerns. These are **well promoted, easily understood and easily accessible.**
- Our aim is to prevent and **minimise the possibility** of abuse although we recognise that even if there are no reported cases of child-on-child abuse, **it may still be taking place**. Children and young people who abuse others are responsible for their behaviour and safeguarding action must include addressing that behaviour and its causes. Responses should be **proportionate** and should **not criminalise children unnecessarily.**
- Children may not find it easy to tell staff about their abuse verbally. Some children may not be able to communicate verbally while others may face **additional barriers**. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report.
- **Pre- planning, effective training and policies** also provide us with the foundation for a calm, considered and appropriate response to any reports.
- Governors ensure that the school contributes to **multi-agency working in line with statutory guidance.** Where necessary, we consult with external agencies in order to seek advice, contribute to multi-agency assessment, planning and support and, where necessary, criminal justice and other proceedings.

We reflect on any issues / incidents and reflect on our response(s) to them, i.e. we constantly evaluate what we do and how we do it to ensure that we remain fit-for-purpose and robust

Responding to Concerns, Reports and / or Allegations of Child On Child Abuse, Sexual Violence or Sexual Harassment (a) Guidance for Staff

1. Worrying or unacceptable behaviour will never be ignored, accepted or be passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'.
2. If staff have **any** concerns about a child’s welfare, they should act on them immediately rather than wait to be told. Abuse that occurs online or outside school or is non recent must not be downplayed and should be treated equally seriously.
3. Someone reporting a concern or making an allegation will never be made to feel rushed, ashamed, responsible, as though they are being difficult or creating a problem. It is essential that victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe.
4. Where listening to a report is concerned, everyone will follow the guidance in this policy. An initial 'disclosure' to a trusted adult may only be the first incident reported, rather than representative of a singular incident. (Trauma can also impact memory so children may not be able to recall all details or timeline of abuse).

5. It is also important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.
6. Any and all concerns relating to child-on child abuse - HSB, sexual violence and / or sexual harassment - will be raised with the DSL / DDSL without delay / as soon as practically possible and a fit-for-purpose professional record made.

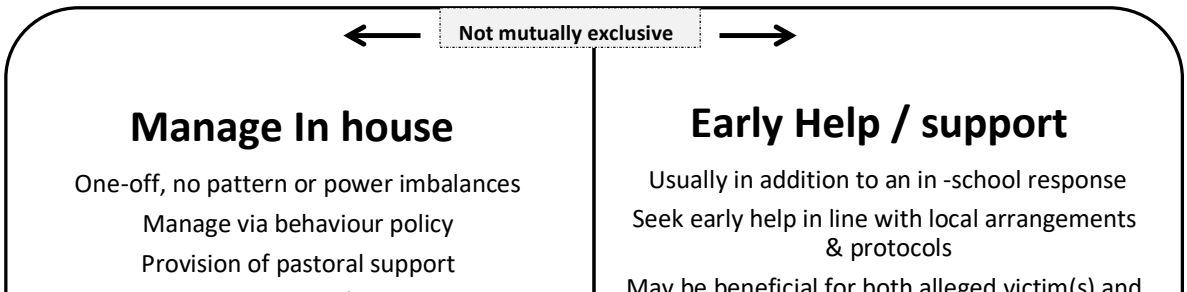
Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Any plan to reduce and / or manage risk posed by a child who is alleged to have abused another must also address their needs and staff must be alert to the possibility that a child or young person who has harmed another may also be a victim; as such, they may have significant unmet needs themselves. They may also be suffering, or at risk of suffering, significant harm and be in need of protection. Taking disciplinary action and providing appropriate support, can, and should, occur at the same time if necessary.

Decisions will be made on a case-by-case basis, with the DSL / DDSL taking a leading role and using their professional judgement, supported by other agencies, as required.

Key Considerations for DSLs

Sense Making	Actions
Nature and seriousness of alleged incident(s) Ages & developmental stages of those involved Any power imbalance(s) / capacity issues One-off or part of a pattern Part of an established relationship Aggravated or experimental	**Violence** - <u>immediate</u> risk and needs assessment **Harassment** - risk assessment on case-by-case basis Immediate steps to protect and support those involved and other children Wishes of victim / confidentiality / information sharing Any potential implications for other CYP inc. siblings Any wider issues within local area, emergent trends or patterns – work with safeguarding partners **Record** Ongoing review of risk assessments and support plans

Response Options for DSL / Deputy DSLs



Making Decisions which Safeguard and Support

Risk management and support will be considered immediately, i.e. without delay in every case. The basic safeguarding principle is:

- If a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care and
- Rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police.

In making what can be difficult decisions, DSL / DDSLs will <u>always</u> consider:

1. the age and the developmental stage of the victim
2. the nature of the allegations, and
3. the potential risk of further abuse.

Decision makers should also be mindful that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s). Overall, decision making and responses are underpinned by the following principles:

- The needs and wishes of the victim will be our paramount consideration (along with protecting the child). It is important they feel in as much control of the process as is reasonably possible.
- Wherever possible, the victim, if they wish, should be able to continue in their normal routine. (Overall, our priority will be to make the victim's daily experience as normal as possible, so that the school is a safe space for them).

All concerns, discussions, decisions and reasons for them will always be recorded.

Confidentiality and Information Sharing

Staff taking a report should never promise confidentiality and there are no easy or definitive answers where a victim asks school staff not to tell anyone about sexual violence or sexual harassment. If they do

not give consent to share information, staff may still lawfully share it if there is another legal basis under the UK GDPR.

DSLs will make these decisions, with appropriate advice. Parents or carers should normally be informed (unless this would put the victim at greater risk).

Ultimately, the DSL / DDSL will need to balance the victim's wishes against their duty to protect the victim and other children. Any decision to make a referral to local authority children's social care and/or a report to the police against the victim's wishes must be handled extremely carefully. The reasons should be explained to the victim and appropriate specialist support offered.

Anonymity
Where a case is progressing through the criminal justice system the DSL / DDSL will continue to lead on the school's behalf, in consultation with the executive headteacher and will be mindful of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately. This also requires that they consider what staff 'need to know' and how to manage any associated social media issues.

Unsubstantiated, Unfounded or Malicious Reports
If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to local authority children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the school will consider whether any disciplinary action is appropriate against the individual who made it as per our behaviour policy.

Appendix 6

Local & National Organisation's Contact Details

Concerns About People / Families	
Bradford Children's Social Care – (integrated Front Door / Initial Contact Point)	T: 01274 433999
Bradford Emergency Duty Team (out of hours) Children's Social Care Emergency Duty Team	T 01274 431010
Bradford Safeguarding Children Partnership (BDSCP)	T: 01274 434361 E: BDSCP@bradford.go.uk
West Yorkshire Prevent Team – for urgent concerns	T: 0800 011 3764
National Domestic Abuse Helpline (24hrs)	T: 0808 2000 247
Help at Hand (Children's Commissioner / LAC)	T: 0800 528 0731 E: help.team@childrenscommissioner.gov.uk
Anti-Terrorism Hotline	T: 0800 789 321
ACT Early (counter terrorism support line)	T: 0800 011 3764
CEOP NCA Safety Centre	W: https://www.ceop.police.uk/SafetyCentre/
NSPCC FGM Helpline	T: 0800 028 3550 E: fgmhelp@nspcc.org.uk
Forced Marriage Unit (FMU)	T: 020 7008 0151 E: fmu@fcdo.gov.uk
Modern Slavery Helpline	T: 08000 121 700
Karma Nirvana	W: https://karmanirvana.org.uk/
Afruca	W: https://afruca.org/
Victim Support	T: 0808 168 9111
Stop It Now Helpline (Child Sexual Abuse)	T: 0808 1000900
ChildLine	T: 0800 1111
UK Safer Internet Centre Professionals Helpline	T: 0344 381 4772 E: helpline@saferinternet.org
Shelter emergency helpline (housing and homelessness)	T: 0808 800 44 44
Runaway Helpline (call or text free)	T: 116 000
MIND	T: 0300 123 3393
The Survivors Trust (national umbrella agency for specialist rape and sexual abuse support organisations for women, men, young people and children)	T: 08088 010818
National Association for People Abused in Childhood (NAPAC)	T: 0808 801 0331
Papyrus	T: 0800 068 41 41
Samaritans	T: 116 123
Concerns About Culture / Whistle blowing	
Protect (formerly Public Concern at Work) (national charity, free whistle-blowing support)	T: 020 3117 2520 W: protect-advice.org.uk

NSPCC Whistle-blowing Advice Line	T: 0800 028 0285 E: help@nspcc.org.uk
Ofsted	T: 0300 123 3155 E: whistleblowing@ofsted.gov.uk