CHILD PROTECTION AND SAFEGUARDING POLICY

September 2024 v10.0

Together, creating opportunity and aspiration for every child

Contents

Together, creating opportunity and aspiration for every child

First Version Implemented	Revision Level	Current Version Adopted by Trust	Review Date	Responsible Person
September 2017	V10.0	September 2024	September 2025	CEO

Statement of Intent

The Priestley Academy Trust is committed to safeguarding and promoting the welfare, both physical, mental and emotional, 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.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance. It will be achieved by:

- Ensuring that members of the trust board, local governing boards, the headteachers and staff members understand their responsibilities under safeguarding legislation and statutory guidance and are alert to the signs of child abuse and know to refer concerns to the Designated Safeguarding Lead (DSL).
- Teaching pupils on how to keep safe and to recognise behaviour that is unacceptable.
- Identifying and making provision for any pupil that has been subject to, or at risk of, abuse, neglect, or exploitation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Ensuring that the headteacher and any new staff members and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.

The school DSLs are:

School	DSL
Atlas Community Primary School	Lisa Simpson, Headteacher
Green Lane Primary School	Bryan Harrison, Executive Headteacher
Lilycroft Primary School	Leah Florence, Headteacher
Margaret McMillan Primary School	Richard Walker, Headteacher
Miriam Lord Primary School	Bryan Harrison, Executive Headteacher
Westbourne Primary School	Jo Marwood, Headteacher

In the absence of the DSL, child protection matters will be dealt with by a deputy DSL, a list of which can be obtained from the school office.

Acronyms

This policy contains a number of acronyms used in the Education sector. These acronyms are listed below alongside their descriptions.

Acronym	Long form	Description
AI	Artificial intelligence	Computer systems and software that are able to perform tasks that ordinarily require human intelligence, such as decision-making and the creation of images.
CCE	Child criminal exploitation	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 in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CSCS	Children's social care services	The branch of the local authority that deals with children's social care.
CSE	Child sexual exploitation	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 in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
DBS	Disclosure and barring service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DPO	Data protection officer	The appointed person in school with responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK GDPR and Data Protection Act.
DSL	Designated safeguarding lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the school.
EEA	European Economic Area	The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland).

EHC plan	Education, health and care plan	A funded intervention plan which coordinates the educational, health and care needs for pupils who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the pupil.
ESFA	Education and Skills Funding Agency	An agency sponsored by the Department for Education with accountability for funding education and skills training for children, young people and adults.
FGM	Female genital mutilation	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.
UK GDPR	UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.
HBA	'Honour-based' abuse	So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.
IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.
KCSIE	Keeping children safe in education	Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
LA	Local authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LAC	Looked-after children	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.
LGBTQ+	Lesbian, gay, bisexual, transgender and queer plus	Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
MAT	Multi-academy trust	A trust established to undertake strategic collaboration and provide education across a number of schools

NPCC	The National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the United Kingdom and the representative body for British police chief officers.
PLAC	Previously looked-after children	Children who were previously in local authority care or were looked after by children's services for more than a period of 24 hours. PLAC are also known as care leavers.
PSHE	Personal, social and health education	A non-statutory subject in which pupils learn about themselves, other people, rights, responsibilities and relationships.
RSHE	Relationships, sex and health education	A compulsory subject from Year 7 for all pupils. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships.
SCR	Single central record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend the school in a non-visitor capacity.
SENDCO	Special educational needs and disabilities coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of the school's special educational needs policy and provision of education to pupils with special educational needs.
SLT	Senior leadership team	Staff members who have been delegated leadership responsibilities in a school.
TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.
VSH	Virtual school head	Virtual school heads are in charge of promoting the educational achievement of all the children looked after by the local authority they work for, and all children who currently have, or previously had, a social worker.

1. Definitions

1.1   The terms **"children"** and **"child"** refer to anyone under the age of 18.

1.2   For the purpose of this policy, The Priestley Academy Trust will define "**safeguarding and protecting the welfare of children**" 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
- Ensuring that pupils grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all pupils to have the best outcomes

1.3   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.

1.4   For the purpose of this policy, the term **"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 the penetration, and A does not reasonably believe that B consents.
- **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- **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.

1.5   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 exploitation, coercion, and threats.

1.6   For the purposes of this policy, **"upskirting"** refers to the act, as identified in 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 harm. Upskirting is a criminal offence. Anyone, including both pupils and teachers, of any gender can be a victim of upskirting.

1.7   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 message that do not contain sexual images.

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

1.9   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

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

1.11 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.

1.12 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, or deliberately induces, illness in a child.

1.13 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 or 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 capacity, 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.

1.14   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 of any gender and age.

1.15   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.

1.16   The term **"teaching role"** is defined as planning and preparing lessons and courses for pupils; delivering lessons to pupils; assessing the development, progress and attainment of pupils; and reporting on the development, progress and attainment of pupils. These activities are not teaching work if the person carrying out the activity does so (other than for the purposes of induction) subject to the direction and supervision of a qualified teacher or other person nominated by the headteacher to provide such direction and supervision.

2. Legal framework

2.1   This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

Legislation

- Children Act 1989
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Children Act 2004
- The Safeguarding Vulnerable Groups Act 2006
- Apprenticeships, Children and Learning Act 2009
- 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 (2023) 'Prevent duty guidance: Guidance for specified authorities in England and Wales'
- DfE (2023) 'Working Together to Safeguard Children 2023'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2024) 'Keeping Children Safe in Education 2024'
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2023) 'Channel Duty Guidance: Protecting people susceptible to radicalisation'
- Home Office and Foreign, Commonwealth and Development Office (2023) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'

Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2017) 'Child sexual exploitation'
- DfE (2024) 'Information sharing'
- DfE (2024) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2021) 'Teachers' Standards'
- DfE (2024) 'Recruit teachers from overseas'
- DfE (2024) 'Working together to improve school attendance'
- DfE (2024) 'Meeting digital and technology standards in schools and colleges'
- Department of Health and Social Care (2024) 'Virginity testing and hymenoplasty: multi-agency guidance'
- DfE (2021) 'Sexual violence and sexual harassment between children in schools and colleges'

This policy operates in conjunction with the following school/Trust policies/procedures:

- Children Missing Education Policy
- Prevent Duty Policy
- Child-child Abuse Policy
- Anti-Bullying Policy
- Suspension and Exclusion Policy
- E-Safety Policy

- Cyber-security Policy
- Technical Acceptable Use Policy
- Data Protection Policy
- Data Retention Policy
- LAC Procedure
- Whistleblowing Policy
- Allegations of Abuse Against Staff Policy
- Safer Recruitment Procedure
- Staff Code of Conduct
- Behavioural Policy
- Social, Emotional and Mental Health (SEMH) Policy

3. Roles and responsibilities

3.1 All staff members have a responsibility to:

- Consider, at all times, what is in the best interests of the pupil.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Provide a safe environment in which pupils can learn.
- Be prepared to identify pupils who may benefit from early help.
- Be aware of the school's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
- Be aware of the role and identity of the DSL and deputy DSLs.
- Undertake safeguarding training, including online safety training (which amongst other things, includes an understanding of the expectations and responsibilities relating to filtering and monitoring), during their induction – this will be regularly updated.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Be aware of the early help process, and understand their role in it.
- Be aware of, and understand, the process for making referrals to Children's Social Care, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral to Children's Social Care and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Support social workers in making decisions about individual children, in collaboration with the DSL.
- Be aware of the signs of abuse and neglect.
- Be aware of and understand the procedure to follow in the event that a child confides they are being abused, exploited or neglected.
- Be aware that a pupil may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.

- Promote dialogue and understanding, and ensure all pupils feel listened to and understood.
- Empower pupils and allow them to understand their rights to safety and privacy, and to help them understand what they can do to keep themselves protected from harm.
- Avoid victim-blaming attitudes, and challenge it in a professional way if it occurs.
- Maintain appropriate levels of confidentiality when dealing with individual cases, and always act in the best interest of the child.
- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Speak to the DSL if they are unsure about how to handle safeguarding matters.
- Be aware of safeguarding issues that can put pupils at risk of harm.
- Be aware of behaviours linked to issues such as drug-taking, alcohol misuse, deliberately missing education, and sharing indecent images, and other signs that pupils may be at risk of harm.
- Act as the lead professional in undertaking an early help assessment, where necessary.
- Follow the school's procedure for, and approach to, preventing radicalisation as outlined in the Prevent Policy.
- Challenge senior leaders over any safeguarding concerns, where necessary.
- Update CPOMS as soon as practically possible following an incident and if critical alert a member of staff straight away.

3.2   Teachers, including the Headteacher, have a responsibility to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'.
- Personally, report any cases to the police where it appears that an act of FGM has been carried out, also referred to as 'known' cases, as soon as possible.

3.3   The governing board has a duty to:

- Take strategic leadership responsibility for the school's safeguarding arrangements.
- Ensure that the school complies with its duties under the above child protection and safeguarding legislation.
- Guarantee that the policies, procedures and training opportunities in the school are effective and comply with the law at all times.
- Guarantee that the school contributes to inter-agency working in line with the statutory guidance 'Working Together to Safeguard Children'.
- Confirm that the school's safeguarding arrangements take into account the procedures and practice of the LA as part of the inter-agency safeguarding procedures.
- Understand the local criteria for action and the local protocol for assessment and ensure these are reflected in the school's policies and procedures.

- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensure that staff working directly with children read at least Part one of KCSIE.
- Ensure that staff do not work directly with children read either Part one or Annex A of KCSIE. **NB:** Individual schools assess which guidance will be most effective for their staff to safeguard and promote the welfare of children.
- Ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities in regard to safeguarding children.
- Ensure a senior board level lead takes leadership responsibility for safeguarding arrangements.
- Appoint a member of staff from the Senior Leadership Team (SLT) to the role of DSL as an explicit part of the role-holder's job description – there should always be cover for the DSL.
- Appoint one or more deputy DSLs to provide support to the DSL and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job description.
- Facilitate a whole-school approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Where there is a safeguarding concern, ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Ensure systems are in place, for children to confidently report abuse, knowing that their concerns will be treated seriously and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible.
- Ensure that staff have due regard to relevant data protection principles that allow them to share and withhold personal information.
- Ensure that a member of the governing board is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the headteacher or another governor.
- Guarantee that there are effective child protection policies and procedures in place together with a staff code of conduct.
- Ensure all relevant persons are aware of the school's local safeguarding arrangements, including the governing board itself, the SLT and DSL.
- Make sure that pupils are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhere to statutory responsibilities by conducting pre-employment checks on staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensure that staff are appropriately trained to support pupils to be themselves in school, e.g. if they are LGBTQ+.

- Ensure the school has clear systems and processes in place for identifying possible mental health problems in pupils, including clear routes to escalate concerns and clear referral and accountability systems.
- Guarantee that volunteers are appropriately supervised.
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training.
- Ensure that all staff members receive safeguarding and child protection training updates, such as e-bulletins, emails and staff meetings, as required, but at least annually.
- Ensure that all governors receive appropriate safeguarding and child protection training upon their introduction and that this training is updated regularly.
- Certify that there are procedures in place to handle allegations against members of staff, volunteers and contractors.
- Confirm that there are procedures in place to make a referral to the Disclosure and Barring Service (DBS) and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned.
- Guarantee that there are procedures in place to handle pupils' allegations against other pupils.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff.
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse.
- Guarantee that there are systems in place for pupils to express their views and give feedback.
- Establish an early help procedure and ensure all staff understand the procedure and their role in it.
- Appoint a designated teacher to promote the educational achievement of looked after children (LAC) and ensure that this person has undergone the appropriate training.
- Ensure that the designated teacher works with the virtual school head (VSH) to discuss how the pupil premium funding can best be used to support LAC.
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities.
- Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regard to the pupil's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for pupils who go missing from school, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect, including sexual abuse or exploitation and prevent the risk of their disappearance in future.
- Ensure that all members of the trust board and local governing board have been subject to an enhanced DBS check.

- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), Data Protection Act 2018, the UK GDPR and the local multi-agency safeguarding arrangements.

3.4   The headteacher has a duty to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession.
- Ensure that the policies and procedures adopted by the Governing Board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff members.
- Provide staff with the appropriate policies and information upon induction.

3.5   The DSL has a duty to:

- Take **lead responsibility** for safeguarding and child protection, including online safety and understand the filtering and monitoring systems and processes in place.
- Provide advice and support to other staff on child welfare, safeguarding and child protection matters.
- Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so.
- Contribute to the assessment of children and/or support other staff to do so.
- During term time, be available at all times during school hours for staff to discuss any safeguarding concerns. **NB:** Individual schools, working with the DSL, will define what "available" means and whether, in exceptional circumstances, availability via phone, videocall, or other media is an acceptable substitution for in-person availability.
- Arrange, alongside the school, adequate and appropriate cover any activities outside of school hours or terms.
- Refer cases:
    – To Children's Social Care where abuse and neglect are suspected and support staff who make referrals Children's Social Care.
    – To the Channel programme where radicalisation concerns arise and support staff who make referrals to the Channel programme.
    – To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
    – To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Act as a source of support, advice and expertise for all staff members, especially on matters of safeguarding by liaising with relevant agencies.
- Act as a point of contact with the safeguarding partners.

- Liaise with the headteacher to inform them of issues, especially regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with the deputy DSLs to ensure effective safeguarding outcomes.
- Refer all cases of suspected abuse to Children's Social Care, the LA designated officer (LADO) for child protection concerns, the DBS, and the police in cases where a crime has been committed.
- Liaise with the case manager and the LA designated officers (LADOs) for child protection concerns in cases concerning staff.
- Liaise with staff members on safety, safeguarding and welfare, including online and digital safety.
- Liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- Liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced and identifying the impact that these issues might be having on their attendance, engagement and achievement in school. The includes:
  – Ensuring that the school knows which pupils have or had a social worker.
  – Understanding the academic progress and attainment of these pupils.
  – Maintaining a culture of high aspirations for these pupils.
  – Supporting teachers to provide additional academic support or reasonable adjustments to help these pupils reach their potential.
  – Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these pupils are experiencing with teachers and the SLT.
- Ensure that child protection files are kept up-to-date and only accessed by those who need to do so.
- Ensure that a pupil's child protection file is transferred as soon as possible and within five days, when transferring to a new school, and consider any additional information that should be shared, and accepting transfers on CPOMS when a child enters or leaves the school.
- Ensure each member of staff has access to and understands the school's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.
- Work with the Trust Board to ensure the school's Child Protection and Safeguarding Policy is reviewed annually and the procedures are updated regularly.

- Ensure the Trust's Child Protection and Safeguarding Policy is available publicly and parents/carers are aware that the school may make referrals for suspected cases of abuse or neglect, as well as the role the school plays in these referrals.
- Link with the local safeguarding partner arrangements to make sure that staff members are aware of the training opportunities available and made aware of the latest local policies on safeguarding.
- Undergo training and update this training at least every two years.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings; this includes understanding the difficulties pupils may have in approaching staff about their circumstances and considering how to build trusted relationships that facilitate communication.
- Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters; specifically, to ensure that staff are supported during the referrals processes; and to support staff to consider how safeguarding, welfare and education outcomes are linked, including to inform the provision of academic and pastoral support.
- Understand the importance of information sharing, including within school, within other schools, and with the safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.
- Be able to keep detailed, accurate and secure written records of safeguarding concerns, decisions made and whether or not referrals have been made, and understand the purpose of record-keeping.

3.6   The designated teacher has a responsibility for promoting the educational achievement of LAC and previously LAC (PLAC), and for children who have left care through adoption, special guardianship, or child arrangement orders who were adopted from state care outside England and Wales.

4. Multi-agency working

4.1   The school contributes to multi-agency working as part of its statutory duty. Governing boards and The Trust should ensure that school contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children.

4.2   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 act in accordance with the safeguarding arrangements.

4.3   New safeguarding partners and child death review partner arrangements are now in place. Locally, the three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for an area (any part of which falls within the local authority) will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.

4.4   It is especially important that schools understand their role in the three safeguarding partner arrangements. Governing boards, The Trust and their senior leadership teams, especially their designated safeguarding leads, should make themselves aware of and follow their local arrangements.

4.5   The three safeguarding partners have a shared and equal duty to work together to safeguard and promote the welfare of children. To fulfil this role, they **must** set out how they will work together and with any relevant agencies. Relevant agencies are those organisations and agencies whose involvement that the three safeguarding parents consider may be required to safeguard and promote the welfare of children with regard to local need. The three safeguarding partners will have set out in their published arrangements which organisations and agencies they will be working with and the expectations placed on any agencies and organisations by the arrangements.

4.6   The three safeguarding partners should make arrangements to allow all schools (including those in multi-academy trusts) and colleges in the local area to be fully engaged, involved and included in safeguarding arrangements. It is expected that, locally, the three safeguarding partners will name schools as relevant agencies and will reach their own conclusions on the best way to achieve the active engagement with individual institutions in a meaningful way.

4.7   If named as a relevant agency, schools, in the same way as other relevant agencies, are under statutory duty to co-operate with the published arrangements.

4.8   Schools should work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans. All schools should allow access for children's social care from the host local authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.

4.9   The school is aware of the expected timeline for its Safeguarding Partnership to fully transition to new system of three safeguarding partners.

4.10   The school will work with CSCS, the police, health services and other services to protect the welfare of its pupils, through the early help process and by contributing to inter-agency plans to provide additional support.

4.11 The school recognises the importance of information sharing between professionals and local agencies in order to effectively meet pupils' needs and identifying any need for early help. Or withholding information, for example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harm test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the UK GDPR. Where in doubt schools should seek independent legal advice.

4.12 Further details on information sharing can be found in [Data protection; toolkit for schools](#) – Guidance to support schools with data protection activity, including compliance with the GDPR.

4.13 Governing boards, The Trust and senior leadership teams, especially the designated safeguarding lead, should be aware of and follow local arrangements. The three safeguarding partners have a shared and equal duty to work together to safeguard and promote the welfare of children. To fulfil this role they must set out how they will work together and with any relevant agencies. Relevant agencies are those organisations and agencies whose involvement that the three safe guarding partners consider may be required to safeguard and promote the welfare of children with regard to local need. The three safeguarding partners will have set out in their published arrangements which organisations and agencies they will be working with and the expectations placed on any agencies and organisations by the arrangements.

4.14 The three safeguarding partners should make arrangements to allow all schools in the local area to be fully engaged, involved and included in safeguarding arrangements. It is expected that, locally, the three safeguarding partners will name schools and colleges as relevant agencies and will reach their own conclusions on the best way to achieve the active engagement with individual institutions in a meaningful way.

4.15 In light of the above, staff members are aware that whilst the UK GDPR and the Data Protection Act 2018 places a duty on schools to process personal information fairly and lawfully, it is not a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm. 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.

4.16 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.

4.17 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

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

4.19   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 also 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 place at risk of harm.

4.20   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.

4.21   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 DSL.

4.22   The school also recognises the particular importance of inter-agency working in identifying and preventing child sexual exploitation (CSE).

5. Early Help

5.1   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 their unique position of having regular daily contact with pupils to identify concerns as early as possible.

5.2   Any pupil may benefit from early help, but in particular staff will be alert to the potential need for early help for pupils who:

- Are disabled, have certain health conditions, or have specific additional needs
- Have SEND, regardless of whether they have a statutory EHC Plan
- Are suffering from mental ill health
- Are young carers
- Are bereaved
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Are frequently missing or going missing from care or from home
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation
- Are at risk of being radicalised or exploited
- Are viewing problematic or inappropriate online content or developing inappropriate relationships online

- Have family members in custody, or are affected by parental offending
- Are in a family circumstance presenting challenges for them, such as drug or alcohol misuse, adult mental health problems, or domestic abuse
- Are misusing drugs or alcohol
- Have returned home to their family from care
- Are at risk of HBA, such as FGM or forced marriage
- Are privately fostered
- Are persistently absent from education, including persistent absences for part of the school day
- Having experienced multiple suspensions and are at risk of, or have been, permanently excluded
- Show early signs of abuse and/or neglect in other ways.

5.3 Early help will also be used to address non-violent harmful sexual behaviour to prevent escalation.

5.4 All staff will be made aware of the local early help process and understand their role in it.

5.5 The school will not limit its support to pupils affected by the above and will be mindful of a variety of additional circumstances in which pupils may benefit from early help, for example, if they are:

- Bereaved
- Viewing problematic or inappropriate online content or developing inappropriate relationships online
- Have recently returned home to their family from care
- Missing education, or are persistently absent from school, or not in receipt of full-time education.

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

5.7 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.

5.8 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 Children's Social Care for assessment for statutory services if the pupil's situation is not improving or is worsening.

6. Abuse and neglect

6.1   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 school, inside and outside of the home and online. Staff will also be aware that pupils can be affected by seeing, hearing or experiencing the effects of abuse.

6.2   All staff will be aware that abuse, neglect and other safeguarding issues are rarely standalone events that can be given a specific label and multiple issues often overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL.

6.3   All staff, especially the DSP and deputy DSL(s), 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).

6.4   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.

6.5   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

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

7.2   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 cases.

8. Child-on-child abuse

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

8.2   The Trust has a zero-tolerance approach to abuse, including child-on-child abuse, as confirmed in the Child Protection and Safeguarding Policy's statement of intent.

8.3   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 the reports. All staff will also recognise that even if not 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.

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

8.5   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.

8.6   The DSL or deputy 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 or deputy DSL will immediately refer the case if it 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.

8.7   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.

8.8   All staff will be made aware of the heightened vulnerability of pupils with SEND, who evidence suggests are more likely to be abused than their peers. Staff will not assume that possible indicators of abuse relate to the pupil's SEND and will always explore indicators further.

8.9   All staff will be made aware of the heightened vulnerability of LGBTQ+ pupils, who evidence suggests are also more likely to be targeted by their peers. In some cases, pupils who are perceived to be LGBTQ+, regardless of whether they are LGBTQ+, can be just as vulnerable to abuse as LGBTQ+ pupils. The school's response to sexual violence and sexual harassment between pupils of the same sex will be equally as robust as it is for incidents between children of the opposite sex.

8.10   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.

8.11   The school's procedures for managing allegations of child-on-child abuse are outlined in the Child-on-child Abuse procedure. Staff will follow these procedures, as well as the procedures outlined in the school's Anti-Bullying Policy and Exclusion Policy, where relevant.

9. Online safety and personal electronic devices

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

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

- 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

9.3   The Trust will ensure that suitable filtering systems are in place on ICT equipment to prevent children accessing inappropriate material, terrorist and extremist material. The school will, however, ensure that the use of filtering and monitoring systems do not cause "over blocking", which may lead to unreasonable restrictions as to what pupils can be taught online.

9.4   The Trust will also ensure that the filtering system meets the filtering and monitoring standards published by the DfE.

9.5   Staff will be aware of filtering 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.

Communicating with parents

9.6   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 online use.

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

Reviewing online safety

9.8   The Trust will carry out an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by pupils.

Personal electronic devices

9.9   The use of personal electronic devices, including mobile phones and cameras, by staff and pupils is closely monitored by the school, in accordance with the Technology Acceptable Policy.

9.10   Staff members will not use personal mobile phones or cameras when pupils are present.

9.11   Staff may use personal mobile phones on school premises outside of working hours when no pupils are present.

9.12   Staff may use personal mobile phones in the staffroom during breaks and non-contact time.

9.13   Mobile phones will be safely stored and in silent mode whilst pupils are present.

9.14   Staff will use their professional judgement in emergency situations.

9.15   Staff may take mobile phones on visits, but they must only be used in emergencies and should not be used when pupils are present.

9.16   Mobile devices will not be used to take images or videos of pupils or staff in any circumstances.

9.17   The sending of inappropriate messages or images from mobile devices is strictly prohibited.

9.18   Staff who do not adhere to this policy will face disciplinary action.

9.19   The e-safety officer will review and authorise any downloadable apps – no apps or programmes will be downloaded without express permission from the e-safety officer.

9.20   The school will adhere to the terms of the e-Safety Policy at all times.

9.21   Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the school's Data Protection Policy. The DPO will oversee the planning of any events where photographs and videos will be taken.

9.22   Where photographs and videos will involve pupils who are LAC, adopted pupils, or pupils for whom there are security concerns, the 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 the pupils' social workers, carers or adoptive parents to assess the needs and risks associated with the pupils.

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

Contractors

9.24   The school will ensure that any contractor or employee of the contractor working on the premises has been subject to the appropriate level of DBS check.

9.25   Checks will be conducted to ensure that the contractor presenting themselves for work is the same person on whom the checks have been made.

9.26   Contractors without a DBS check will be supervised if they will have contact with children. The identity of the contractor will be checked upon their arrival at the school.

Upskirting

9.27   Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting.

9.28   "**Operating equipment**" includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion-activated camera.

9.29   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. Additional advice can be found at Upskirting know your rights.

9.30   Managers should be aware that should staff report any building issues that could contribute, these should be directed to the central team.

10. Consensual and non-consensual sharing of indecent images and videos

10. 1   The school will ensure that staff are aware to treat the contextual and non-contextual sharing of nude or semi-nude images and/or images, (also known as sexting or youth produced sexual images) as a safeguarding concern.

10.2   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 sexting 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.

10.3   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.

10.4   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.

10.4   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.

11. Context of safeguarding incidents

11.1   Safeguarding incidents can occur outside of school and can be associated with outside factors. All staff, particularly the DSL and deputy 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 Children's Social Care.

12. Pupils potentially at greater risk of harm

12.1   The Trust recognises that some groups of pupils can face additional safeguarding challenges 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 outline below.

Pupils who need social workers (Child in Need and Child Protection Plans)

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

12.3   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. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools to safeguard and promote the welfare of children.

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

12.5   Finding from the Children in Needs review, 'Improving the educational outcomes of Children in Need of help and protection' contains further information; the conclusion of the review, 'Help, protection, education' sets out action Government is taking to support this.

Home-educated children

12.6   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.

12.7   In line with the Education (Pupil Registration) (England) Regulations 2006, the school will inform the LA of all deletions from the admissions register when a pupil is taken of roll.

12.8   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

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

12.10   The Governing Board will ensure that staff have the skills, knowledge and understanding to keep LAC and PLAC safe. This includes ensuring 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 level of authority delegated to the carer by the authority looking after the pupil.

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

Pupils with SEND

12.13   The school recognises that pupils with SEND or those with certain health conditions can face additional safeguarding challenges, and understands that further barriers may exist when determining abuse and neglect in this group of pupils.

12.14   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 explanation
- Pupils with SEND can be disproportionally impacted by things like bullying, without outwardly showing any signs
- Communication barriers may exist, as well as difficulties in overcoming these barriers.

12.15   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 family where appropriate, to ensure that the pupil's needs are met effectively.

LGBTQ+ pupils

12.16   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 who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as pupils who identify as LGBTQ+.

12.17   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 require mental health support

12.18   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.

13. Use of the school premises for non-school activities

13.1   Where the school hires or rents out school facilities or the school premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate arrangements are in place to keep pupils safe.

13.2   The school will refer to the DfE's guidance on keeping children safe in out-of-school settings in these circumstances.

13.3   Where the school provides the activities under the direct supervision or management of school staff, child protection arrangements will apply.

13.4   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.

13.5   The school will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a 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

13.6   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.

13.7   Staff and volunteer staff running clubs and extracurricular activities are aware of their safeguarding responsibilities and promote the welfare of pupils.

13.8   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.

13.9   All national governing boards 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.

14. Alternative provision

14.1   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.

14.2   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.

15. Work experience

15.1   When a pupil is sent on work experience, the school will ensure that the provider has appropriate safeguarding policies and procedures in place. Where the school has pupils conduct work experience at the school, an enhanced DBS check will be obtained if the pupil is over the age of 16.

16. Homestay exchange visits

School-arranged homestays in UK

16.1   When the school is arranging for a visiting child to be provided with care and accommodation in the UK in the home of a family to which the child is not related, the responsible adults are considered to be in regulated activity for the period of the stay. In such cases, the school is the regulated activity provider; therefore, the school will obtain all the necessary information required, including a DBS enhanced certificate with barred list information, to inform its assessment of the suitability of the responsible adults.

16.2   Where criminal record information is disclosed, the school will consider, alongside other information, whether the adult is a suitable host. In addition to the responsible adults, the school will consider whether a DBS enhanced certificate should be obtained for anyone else aged over 16 in the household.

School-arranged homestays abroad

16.3   The school will liaise with partner schools to discuss and agree the arrangements in place for the visit. The school will consider, on a case-by-case basis, whether to contact the relevant foreign embassy or High Commission of the country in question to ascertain what checks may be possible in respect of those providing homestay outside of the UK. The school will use its professional judgement to assess whether the arrangements are appropriate and sufficient to safeguard every child involved in the exchange. Pupils will be provided with emergency contact details to use where an emergency occurs or a situation arises that makes them feel uncomfortable.

Privately arranged homestays

16.4   Where a parent or pupil arranges their own homestay, this is a private arrangement and the school is not the regulated activity provider.

Private fostering

16.5   Where the period of UK homestay lasts 28 days or more for a child aged under 16, or under 18 for a child with SEND, this may amount to private fostering under the Children Act 1989. Where the school becomes aware of a pupil being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

17. Concerns about pupils

17.1   If a staff member has any concerns 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 with the DSL, or deputy DSL.

17.2   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.

17.3   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.

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

17.5   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.

17.6   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 those decisions, will be recorded in writing by the DSL and kept securely in a locked cabinet in the school office/the headteacher's office/the DSL's office.

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

17.8   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.

17.9   An inter-agency assessment will be undertaken where a child and their family could benefit from co-ordinated 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.

17.10   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.

18. Managing referrals

18.1   The reporting and referral process outlined in the Reporting Safeguarding Concerns Process Flowchart (below) will be followed accordingly.

18.2   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.

18.3   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.

18.4 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.

18.5 The school will not wait for the start or outcome of an investigation before protecting 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.

18.6 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 that the arrangements in place, such as in-school interventions, are effectively supported and know where they can access additional support.

19. Concerns about school safeguarding practices

19.1 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

20.1 All allegations against staff, supply staff, volunteers and contractors will be managed in line with the school's Allegations of Abuse Against Staff Policy, a copy of which will be provided to, and understood by, all staff. 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.

20.2 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 (this includes behaviours outside of school).

20.3   Allegations should be reported to the LADO 'without delay'.

20.4   Before contacting the LADO, schools and colleges should conduct basic enquiries in line with local procedures to establish he facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

20.5   The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school or college, or a combination of these.

Low-level concerns

20.6   Concerns may be graded low-level if the concern does not meet the criteria for an allegation: and the person* has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Example behaviours include, but are not limited to:

- Being over friendly to children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language

20.7   If the concern has been raised via a third party, the Headteacher should collect as much evidence as possible by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously.
- To the individual involved and any witnesses.

20.8   Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

20.9   Staff should be encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

20.10   Low-level concerns should be recorded in writing, including:

- Name* of the individual sharing their concerns
- Details of the concern
- Context in which the concern arose

- Action taken

(If the individual wishes to remain anonymous then that should be respected as far as reasonably possible).

20.11 Records must be kept confidential, held securely and comply with the Data Protection Act 2018. Schools and colleges should decide how long they retain such information, but it is recommended that it is kept at least until the individual leaves their employment.

20.12 Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

20.13 If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO.

20.14 The records' review might identify that there are wider cultural issues within the school or college that enabled the behaviour to occur. This might mean that policies and processes could be revised, or extra training delivered to minimise the risk of it happening again.

21. Communication and confidentiality

21.1 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 or transfer including in-year and between primary and secondary education, and with safeguarding partners, other agencies, organisations and practitioners.
- Understanding 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 rational 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 Programme.

21.2 All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with school data protection policies.

21.3 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.

21.4   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.

21.5   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.

21.6   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 understanding 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.

21.7   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.

21.8   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

22.1   The Trust's full policy and procedures for safer recruitment are outlined in the Safe Recruitment procedure.

22.2   An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- Are responsible on a daily basis for the care or supervision of children
- Regularly work in the school at times when children are on the premises
- Regularly come into contact with children under 18 years of age

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

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

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

Staff suitability

22.6   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.

22.7   A person may be disqualified if they:

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

22.8   All staff members are required to sign the Staff Disqualification Declaration Form confirming that they are not disqualified from working in a schooling environment. If there is a change in circumstance it is the staff member's responsibility to inform the headteacher.

22.9   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

22.10   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

22.11   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 and has been removed from working in regulated activity.

22.12   The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or they are suspended.

Pre-employment checks

22.13   A safer recruitment trained senior manager will assess the suitability of prospective employees by:

- Verifying the candidate's identity, preferably from current photographic ID and proof of address except where, for exceptional reasons, none is available.

- Obtaining a certificate for an enhanced DBS check with barred list information where the person will be engaged in regulated activity.
- Obtaining a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available.
- Checking that a candidate to be employed as a teacher is not subject to a prohibition order issued by the Secretary of State, using the Teacher Services' System.
- Verifying the candidate's mental and physical fitness to undertake their working responsibilities, including asking relevant questions about disability and health to establish whether they have the physical and mental capacity for the specific role.
- Checking the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, the advice set out on the gov.uk website will be followed.
- From the 1 January 2021 the TRA Teacher Services system will no longer maintain a list of those teachers who have been sanctioned in EEA members states. Individuals who have lived or worked outside the UK **must** undergo the same checks (as above) as all other staff in schools, this includes obtaining (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity) even if the individual has never been to the UK. In addition, schools **must** make any further checks they think appropriate so that any relevant events that occurred outside the UK can be considered. These checks could include, where available:

  - **criminal records checks for overseas applicants** https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants – Home Office guidance can be found on **GOV.UK**; and for teaching positions
  - obtaining a letter of professional standing from the professional regulatory authority in the country in which the applicant has worked. Advice about which regulatory or professional body applicants should contact is available from the National Recognition Information Centre for the United Kingdom, **UK NARIC** https://www.ecctis.com/

Where available, such evidence can be considered together with information obtained through other pre-appointment checks to help assess their suitability. Where this information is not available schools should seek alternative methods of checking suitability and or undertake a risk assessment that supports informed decision making on whether to proceed with the appointment.

Although sanctions are restrictions imposed by another regulatory authority do not prevent a person from taking up teaching positions in England, schools should consider the circumstances that led to the restriction or sanction being imposed when considering a candidate's suitability for employment. Further information

can be found in DfE Guidance: *Recruit teachers from overseas*
https://www.gov.uk/guidance/recruit-teachers-from-overseas

- Checking professional experience and qualifications as appropriate.
- Confirming that an individual taking up a management position is not subject to a section 128 direction.

22.14 A DBS certificate will be obtained from candidates before or as soon as practicable after appointment. An online update check may be undertaken through the DBS update service if an applicant has subscribed to it and gives their permission.

Internal Candidates

22.15 References from internal candidates will always be scrutinised before appointment.

Barred list check

22.16 An enhanced DBS check may be requested for anyone working in the school that is not in regulated activity, but not with a barred list check.

22.17 If there are concerns about an applicant, an enhanced DBS check with barred list information may be requested, even if he/she has worked in regulated activity in the three months prior to appointment.

22.18 Written information about their previous employment history will be obtained from candidates and the appropriate checks undertaken to ensure information is not contradictory or incomplete.

References

22.19 References will be obtained directly from referees and scrutinised, with all concerns satisfactorily resolved prior to confirmation of employment.

22.20 References will only be accepted from a senior person and not from a colleague.

22.21 References will be obtained prior to interviews taking place and discussed during interviews.

22.22 Open testimonials will not be considered.

22.23 Information about past disciplinary actions or allegations will be considered carefully when assessing an applicant's suitability for a post.

22.24 Information sourced directly from a candidate or online source will be carefully vetted to ensure they originate from a credible source.

22.25 References will be sought on all short-listed candidates, including internal ones, before interview and checked on receipt to ensure that all specific questions were answered satisfactorily.

22.26 Information about past disciplinary action or allegations will be considered carefully when assessing an applicant's suitability for a post.

22.27   Checks will be conducted to ensure that the contractor presenting themselves for work is the same person on whom the checks have been made.

23. Single Central Record (SCR)

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

23.2   The MAT holds a central SCR containing information that is easily accessible and recorded in such a way that allows for details for each individual academy to be provided separately, and without delay, to all who need to see it, including Ofsted.

23.3   The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS 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

23.4   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 of 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 confirmation was received.

23.5   If any checks have been conducted for volunteers, this will also be recorded on the SCR. If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded.

23.6   Written confirmation that supply agencies have completed all relevant checks will also be included.

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

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

24. The Safeguarding Opportunities to teach safeguarding

24.1   The Governing board should ensure children are taught about safeguarding, including online safety. Schools should consider this as part of providing a broad and balanced curriculum.

24.2   This may include covering relevant issues through Relationships Education. The statutory guidance can be found here: [Statutory guidance: relationships education relationships and sex education (RSE) and health education](#). The following resources may also help:

- DfE advice for schools: [teaching online safety in schools](#)
- UK Council for Internet Safety (UKCIS) guidance: [Education for a connected-world](#)
- National Crime Agency's CEOP education programme: [Thinkuknow](#)
- Public Health England: [Rise Above](#)

25. Training

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

25.2   The induction training will cover:

- The Child Protection and Safeguarding Policy
- The Child-on-child Abuse procedures
- The Staff Code of Conduct
- Part one of the 'Keeping children safe in education' (KCSIE) (or Annex A, if appropriate)
- The Behaviour Policy
- The safeguarding response to children who go missing 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.
- The identity of the DSL and any deputies
- The role of the DSL and deputy DSLs

25.3   All staff members will also receive regular safeguarding and child protection updates as required, but at least annually.

25.4   Training will cover, at a minimum:

- The issues surrounding sexual violence and sexual harassment
- Contextual safeguarding
- How to keep previously LAC and PLAC safe
- Child criminal exploitation and the need to refer cases to the National Referral Mechanism
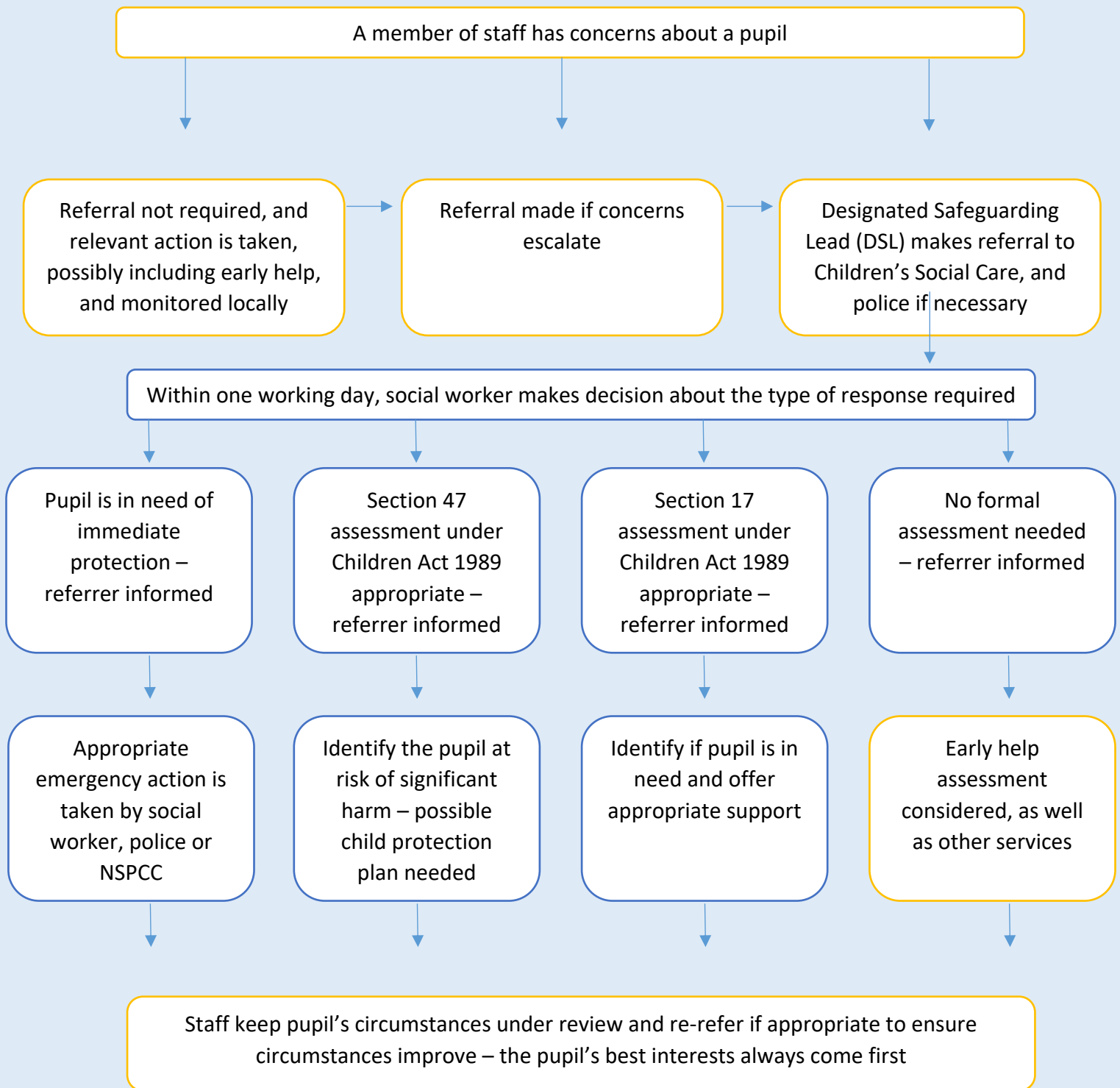- Updated online safety training

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

25.6   The DSL will undergo updated child protection training every two years, as well as additional training to refresh their skills and knowledge at regular intervals (at least annually) to allow them to keep up 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 conferences, to enable the DSL to attend and contribute to these effectively when required.
- The importance of providing information and support to CSCS.
- The lasting impact that adversity and trauma can have.
- 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.

25.7   The DSL and deputy DSLs will also undergo regular Prevent awareness training which will enable them to understand and support the school with regards to the Prevent duty and equip them with the knowledge needed to advise staff.

25.8   Online training will also be conducted for all staff members as part of the overall safeguarding approach.

26. Monitoring and review

26.1   This policy is reviewed annually by the DSL, headteacher and Board of Trustees. This policy will be updated as needed to ensure it is up-to-date with safeguarding issues as they emerge and evolve, including any lessons learnt.

26.2   Any changes made to this policy by the headteacher, DSL and Board of Trustees will be communicated to all members of staff.

26.3   All members of staff are required to familiarise themselves with all processes outlined in this policy as part of their induction programme.

26.4   The next scheduled review date for this policy is shown on the front page of this document.

Reporting Safeguarding Concerns Process Flowchart

A member of staff has concerns about a pupil

Referral not required, and relevant action is taken, possibly including early help, and monitored locally → Referral made if concerns escalate → Designated Safeguarding Lead (DSL) makes referral to Children's Social Care, and police if necessary

Within one working day, social worker makes decision about the type of response required

| Pupil is in need of immediate protection – referrer informed | Section 47 assessment under Children Act 1989 appropriate – referrer informed | Section 17 assessment under Children Act 1989 appropriate – referrer informed | No formal assessment needed – referrer informed |

| Appropriate emergency action is taken by social worker, police or NSPCC | Identify the pupil at risk of significant harm – possible child protection plan needed | Identify if pupil is in need and offer appropriate support | Early help assessment considered, as well as other services |

Staff keep pupil's circumstances under review and re-refer if appropriate to ensure circumstances improve – the pupil's best interests always come first

Key

	School action
	Other agency action

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.

Here are the issues covered:

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

1. Domestic abuse

For the purpose 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.

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

2. Homelessness

The DSL and deputy DSL(s) will be aware of the contact details and referral routes in to 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 the following:

- 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 Children's Social Care 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 Children's Social Care will be made as necessary where concerns are raised.

3. Children absent from education

A child going 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 absent from education supports identification such as 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. 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 five 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/carers when any changes occur. Two emergency contact details 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/carer 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/carer with whom the pupil will live
- The new address
- The date from which the pupil will live at this address

If a parent/carer 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 the internet system school2school to securely transfer pupils' data.

In order 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 school by their parents/carers, 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 neither he/she nor his/her parent/carer has indicated the intention to continue to attend the 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/carer with whom the pupil lives
- At least one telephone number of the parent/carer with whom the pupil lives
- The full name and address of the parent/carer 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/carers e.g. where an address is unknown. The school will also highlight any other necessary, contextual information, including safeguarding concerns.

4. 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. The 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.

5. 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 missing school or education or not taking part

County lines

For the purposes of this policy, "**county lines**" refers to describe 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, using dedicated mobile phone lines or other forms of "deal line".

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 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.

6. Cyber-crime

For the purpose 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.

7. Child sexual exploitation (CSE)

For the purpose 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 or young person into sexual activity, for either, or both, of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or increased status 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 a 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 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 missing school or education or not taking part
- Having older partners
- Suffering from sexual transmitted infections
- Displaying sexual behaviours beyond expected sexual development
- Becoming pregnant

All concerns related to CSE will be managed in line with relevant policies.

CSE does not always involve physical contact, as it can also occur online. It is also important to note that a child can be sexually exploited even if the sexual activity appears consensual.

The Priestley Academy Trust has adopted the following procedure within all its schools for handling cases of CSE, as outlined by the DfE:

1. **Identifying cases**
   School staff members are aware of and look for key indicators of CSE; these are as follows:

   - Going missing for periods of time or regularly going home late
   - Regularly missing lessons
   - Appearing with unexplained gifts and new possessions
   - Associating with other young people involved in exploitation
     - Having older boyfriends or girlfriends
     - Undergoing mood swings or drastic changes in emotional wellbeing
     - Displaying inappropriate sexualised behaviour
     - Suffering from sexually transmitted infections or becoming pregnant
     - Displaying changes in emotional wellbeing
     - Misusing drugs or alcohol

2. **Referring cases**
   Where CSE, or the risk of it, is suspected, staff will discuss the case with the dedicated member of staff for child protection. If after discussion a concern still remains, local safeguarding procedures will be triggered, including referral to the LA.

3. **Support**
   The LA and all other necessary authorities will then handle the matter to conclusion. The school will co-operate as needed.

8. 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 be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

9. Female genital mutilation (FGM)

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

All staff will be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. If staff members are worried about someone who is at risk of FGM, or has been the victim of FGM, they are required to share this information with Children's Social Care and/or the police, as well as the DSL. If a staff member **knows** a child has been subject to FGM they have a legal duty to contact the police. They should then inform the DSL. 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 in section 74 of the Serious Crime Act 2015), teachers are personally and **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a girl under the age of 18. Teachers failing to report such cases will 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 that there are a range of potential indicators that a pupil may be at risk of FGM. While some individual indicators 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 it is important for staff to be sensitive when broaching the subject.

Indicators that may show a heightened risk of FGM include the following:

- 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 personal, social and health education (PSHE)

Indicators that may show FGM could take place soon:

- When a female family elder is visiting from a country of origin
- A girl may confide that she is to have a 'special procedure' or a ceremony to 'become a woman'
- A girl may request help from a teacher if she is aware or suspects that she is at immediate risk
- A girl, or her family member, may talk about a long holiday to her country of origin or another country where the practice 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 following:

- 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
- Prolonged or repeated absences from school followed by withdrawal or depression
- Reluctance to undergo normal medical examinations
- Asking for help, but not being explicit about the problem due to embarrassment or fear

Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they will 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 Children's Social Care as appropriate.

FGM is also included in the definition of **"honour-based" violence (HBV)** or **"honour-based" abuse (HBA)**, which involves crimes that have been committed to defend the honour of the family and/or community, alongside forced marriage and breast ironing. 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 activate local safeguarding procedures if concerns arise.

10. 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 eight, 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 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 of 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. 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.

11. 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.

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
- Becoming anxious, depressed and emotionally withdrawn with low self-esteem
- Showing signs of mental health disorders and behaviours such as depression, self-harm or anorexia
- Displaying a sudden decline in their educational performance, aspirations or motivation
- Regularly being absent from school
- An obvious family history of older siblings leaving education early and marrying early

Staff who have any concerns regarding a child 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 Children's Social Care, 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 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.

12. 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 Trust will actively assess the risk of pupils being drawn into extremism and/or terrorism. Staff will be alert to changes in pupils' behaviour which could indicate that they may be in need of help or protection. Staff will use their professional judgement to identify pupils who may be at risk or radicalisation and act appropriately, which may include making a referral to the Channel programme. The school will work with the Safeguarding Partnerships as appropriate.

The school will ensure that it engages with parents/carers and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise the family members who raise concerns, and provide information for support mechanisms. Any concerns over radicalisation will be discussed with a child's parents/carers, 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.

Extremist speakers

The Trust prevents speakers who may promote extremist views from using the school premises.

The Prevent duty

Under section 26 of the Counter-Terrorism and Security Act 2015, all schools are subject to 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 Trust's wider safeguarding obligations.

The Trust's procedures for carrying out the Prevent duty, including how it will engage and implement the Channel programme, are outlined in the Prevent Duty procedures.

13. 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.

14. 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.

Pupils will also be provided with the booklet 'Going to Court' from HM Courts and Tribunals Service (HMCTS) where appropriate and allowed the opportunity to discuss questions and concerns.

15. Mental health

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

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 that they may be experiencing a mental health problem or 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.

16. 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 be aware that the Police, Crime, Sentencing and Courts Act will introduce a new duty in early 2023 on a range of specified authorities, such as the police, to share data and information, and put plans in place to prevent and reduce serious violence within their local communities. Schools will be under a separate duty to cooperate with core duty holders when asked – the school will ensure arrangements are in place to do so.

17. Adult involvement in youth-produced sexual imagery (YPSI)

Sexually motivated incidents

The school will remain aware that not all instances of 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 of 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 post 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 – Elective Home Education (EHE)

You should encourage parents to send their children to school, particularly those who are vulnerable.

EHE does not automatically put children at greater risk of harm. You should consider whether a parent's decision to educate at home gives greater cause for concern to remaining in school.

If you feel there is additional cause for concern, you should follow your own organisation's child safeguarding policy and refer this to the Designated Safeguarding Lead (DSL) who will then consider making a referral to the local authority in line with existing procedures. This should happen as soon as you become aware of a parent's intention, or decision, to home educate.

Alerting local authorities as soon as possible where needed helps them to check if a child is receiving statutory social care services and notify any relevant social worker to work with the home education team to carry out any further checks or assessments that may be needed.

Part 1 of **keeping children safe in education** is clear that you are expected to support social workers and other agencies following any referrals. You will already be aware which children have a social worker assigned to them or their immediate family.

You should work with local authorities and, where possible, coordinate meetings with parents to seek to ensure EHE is being provided in the best interests of the child.

You may find it helpful to direct parents to **the advice on understanding what EHE is**. Schools are not required to provide any support to parents that have withdrawn their child for EHE. Support provided by Local Authorities is discretionary, including support for a child's special educational needs.

If a parent wants you to admit their child, you should follow your normal processes for in-year admissions applications. Or, put them in touch with their local authority admissions team to discuss **how to apply for a school place for their child**.

If you have a suggestion that a family are considering removing children to home educate, please contact us Bradford EHE as soon as possible at electiveheducation@bradford.gov.uk or 01274 439340 in order for us to swiftly understand the implications for the child. Please note that current FAP policy suggests a return to the previous school roll with a School Attendance Order where a child is not in receipt of a suitable full-time education.