Shires MAT Safeguarding Policy 2026-2027

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Approved by: Trust Board	**Approval Date: [Insert Trust Board approval date]**
Mr Mike Thake, Chair of Trust Board 	**Review Frequency: Annually**
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Local Details – Key Contacts, Appendices Reviewed: DSL/Headteacher: Mrs Tanya Howarth	**Review Date: 1st September 2026**
Approved by Local Governance Committee	**Approval Date: [Insert Trust Board approval date]**

Updates from previous versions of policy

Date updated	Version	Change from last version
05.09.23	Version 1.2	Updated in line with KCSIE - Filtering and Monitoring Standards - Changes to Forced Marriage Guidance - Safer Recruitment Updates
	Version 1.3	Updated in line with KCSIE 24
	Version 1.4	Addition of Annex 19: Absconding or Missing Pupils Procedure
03.09.25	Version 1.5	Updated in line with KCSIE 2026 consultation draft; subsequently superseded by final published KCSIE 2026 validation.
08.07.26	Version 1.6	Finalised against the published KCSIE 2026 guidance, effective from 1 September 2026. Key changes are integrated across the policy and annexes; green highlight identifies amendments.

Key Contacts:
LOCAL CONTEXTUALISATION REQUIRED: Each school must review and complete all named contacts, local referral routes, LADO details, DSL cover arrangements, recording routes and local safeguarding partnership information before Local Governance Committee approval.

Internal:

Shires Multi Academy Trust CEO: Mr Lee Gray

Contact details: ceo@shiresmat.org.uk

Named Trustee for Safeguarding: Mr Mike Thake

Contact details: Through the clerk to Trustees npurslow@shiresmat.org.uk

Local nominated Governor Lead for Safeguarding: Julie Grieve

Contact details: jgrieve@fps.shiresmat.org.uk

Headteacher / Head of School: Mrs Tanya Howarth

Contact details: thowarth@fps.shiresmat.org.uk 01527 892756

Designated Safeguarding Lead (DSL): Mrs Tanya Howarth

Contact details: thowarth@fps.shiresmat.org.uk 01527 892756

Deputy Designated Safeguarding Leads (DDSLs):

Catherine O'Donnell: codonnell@fps.shiresmat.org.uk

Iona McQueen: imcqueen@fps.shiresmat.org.uk

Other named staff and contacts:

Designated teacher for children in care / previously looked-after children:

Catherine O'Donnell: codonnell@fps.shiresmat.org.uk

Online safety lead / coordinator:

Catherine O'Donnell: codonnell@fps.shiresmat.org.uk

External:

Children's Social Care / Multi-Agency Safeguarding Hub: 01905 822666

Out-of-hours Emergency Duty Team: 01905 768020

Police Public Protection Unit: 24hrs non-emergency 101 Emergency 999

Local Authority Prevent lead and Channel contact:

Paul Kinsella: pkinsella@worcestershire.gov.uk 01905 846550

Local Authority Education / safeguarding adviser:

Denise Hannibal: dhannibal@worcschildrenfirst.org.uk

Local Authority Designated Officer (LADO):

lado@worcschildrenfirst.org.uk / 01905 846221

NSPCC Helpline: 0808 800 5000

NSPCC 'What you can do to report abuse' dedicated helpline: 0800 028 0285

Childline: 0800 1111

Ofsted: 0300 123 1231

National Domestic Abuse Helpline: 0800 2000 247

Operation Encompass Teacher's Helpline: 0204 513 9990

Channel / Prevent contacts:

Paul Kinsella: pkinsella@worcestershire.gov.uk 01905 846550

Police: 101

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1 Introduction

Document status: Final draft for Trust Board and local governance approval. Green highlight identifies content integrated or amended following the published KCSIE 2026 guidance. Yellow highlight identifies school-specific information that must be completed or checked by each academy. This policy should be adopted for implementation from 1 September 2026.

Final KCSIE 2026 validation summary: this policy has been checked against Annex C of the published KCSIE 2026 guidance. The additional final-publication changes from the earlier draft version are woven into the main policy and annexes, with particular emphasis on the removal of the volunteer supervision exemption from regulated activity, the updated terminology "making or sharing nudes or semi-nudes", the new Part one overview not replacing Part one, and the additional requirements around information sharing, sport, premises, temporary accommodation notifications, HSB resources and public sector equality duties.

Implementation note: KCSIE 2026 was published for information on 7 July 2026 and comes into force on 1 September 2026. Schools must continue to operate under KCSIE 2025 until 31 August 2026 and should use this policy for 2026-27 adoption once local school details have been checked and completed.

1.1 The Academy fully recognises its moral and statutory responsibilities for safeguarding and promoting the welfare of children, which is defined as: providing help and support to meet the needs of children as soon as problems emerge, protecting children from maltreatment, whether that is within or outside the home, including online; preventing the impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. Further clarification is outlined below:

1.2

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Making or sharing nudes and semi-nudes means the creation, sending or posting of nude or semi-nude visual content by children under 18. Images include photographs, videos and livestreams and may be self-generated, taken or created by another person, digitally altered or wholly generated using artificial intelligence, including "deepfakes" or "deep nudes". All incidents require a safeguarding response, whether the making or sharing is consensual or non-consensual.

Children includes everyone under the age of 18.

Data protection laws means the Data Protection Act 2018, the UK General Data Protection Regulation and the Data (Use and Access) Act 2025.

The three safeguarding partners are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

The Local Authority (LA)
Integrated Care Boards (previously Clinical Commissioning Groups) for an area within the LA
The Chief Officer of Police for a police area in the LA area

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children and young

people) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

1.2 This policy has been developed to help the Academy fulfil its safeguarding obligations in accordance with the principles and legal requirements established by the Children Acts 1989 and 2004; the Education Act 2002; the Prevention of Terrorism Act 2002; and the Counter Terrorism and Security Act 2015; and in line with government publications the Teachers' Standards 2012, 'Working Together to Safeguard Children' 2026, 'Keeping Children Safe in Education' and 'What to do if you're worried a child is being abused 2015-Advice to Practitioners'.

This policy is based on the Department for Education's statutory guidance *Keeping Children Safe in Education 2026,* and *Working Together to Safeguard Children 2026.* It should be read alongside What to do if you're worried a child is being abused: advice for practitioners and, where applicable, section 3 of the *Early Years Foundation Stage statutory framework*. The school/college will have regard to this guidance, comply with its legal duties, and follow the arrangements agreed and published by the three local safeguarding partners.

This policy is also based on the following legislation:

- The Data Protection Act 2018, the UK GDPR, and the Data (Use and Access) Act 2025, referred to collectively in this policy as "data protection laws".
- The School Attendance (Pupil Registration) (England) Regulations 2024, including requirements relating to deletion from the admission register and returns to the local authority.
- The School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014, including requirements relating to toilets, changing accommodation and showers.
- The Crime and Policing Act 2026, which removes the supervision exemption from regulated activity for relevant volunteer activity.
- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils/students
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques
- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children

1.3 Our policy applies to all staff, governors, supply staff and volunteers working in the academy and is available to parents and carers on our website and in paper form from reception. This policy can be made available in large print or other accessible format if required.

1.3A This policy applies to all trustees, local governors, employees, agency and supply staff, trainee teachers, volunteers, contractors, visitors, work-experience providers, host families and

organisations using school premises. Safeguarding responsibilities apply whether activity takes place on site, off site or online.

1.4 There are six main elements to our policy:

1.4.1 ensuring we practice Safer Recruitment in checking the suitability of staff and volunteers to work with children;

1.4.2 raising awareness of Child Protection issues and equipping children with the skills needed to keep them safe;

1.4.3 developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse;

1.4.4 equipping staff, governors, supply staff and volunteers with the necessary information and training to enable them to meet their Child Protection responsibilities;

1.4.5 supporting pupils who have been identified as in need of early help or at risk of harm in accordance with his/her agreed Child Protection, Child in Need or Early Help plan;

1.4.6 establishing a safe environment in which children can learn and develop.

1.4.7 All staff, including those who do not work directly with children, must read Part one of Keeping Children Safe in Education and Annex A in full. The Trust will evidence this through induction, annual safeguarding training and written confirmation of understanding. The former condensed Annex A route must not be used. The DfE Part one overview for all staff may be used as a helpful quick-reference aid but does not replace the requirement to read Part 1 and Annex A in full.

1.5 We ensure that all pupils (including those who have a faith background and those who do not) have a thorough understanding of, and positive approach to, the beliefs and values that under-pin modern British society. This "Golden Thread" runs through our approach to teaching and learning. To ensure pupils remain safe and are not put at risk by the promotion of violent and/or extremist views, the study of democratic principles and the right of all individuals to equality of opportunity is an integral part of our school curriculum, including RE, RHSE and citizenship and the development of pupils' spiritual, moral, social and cultural skills and awareness.

1.6 We ensure a whole school approach to safeguarding and operate with the best interests of the children at the heart of everything we do. We ensure other Academy policies have links with our safeguarding policy to ensure that they reinforce all aspects of the Prevent agenda and all aspects of our Child Protection strategies are reinforced through the school curriculum and our approach to teaching and learning wherever possible

1.7 We ensure our policy takes into account the Human Rights Act and Equality Act

1.7.1 The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them.

1.7.2 Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Further information (including on absolute and qualified rights) can be found at Human Rights | Equality and Human Rights Commission (equalityhumanrights.com).

1.7.3 As a group of schools we understand how the Equality Act affects us and how to fulfil our duties under the act can be found in the **Equality Act 2010: advice for schools - GOV.UK** (www.gov.uk). We ensure that we do not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief or sexual orientation and the responsible body ensures policy does not discriminate against, harass or victimise a pupil or potential pupil. The responsible body at Feckenham CE Primary School includes both the Trust Board and Local Governance Committee.

1.7.4 We recognise early signals that support is needed and track, monitor and intervene with students who need help at the earliest point to prevent further harm or escalation. All staff and governors understand Early help/Family Help and recognise that any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

1.7.5 Safeguarding practice distinguishes between universal services and community-based early help, and the targeted early help level of Family Help. Schools will work within the local safeguarding partnership assessment protocols, published threshold guidance, Family Help arrangements and escalation routes so that children receive the right help at the right time before statutory intervention is required.

1.7.6 Feckenham CE Primary School follows the procedures and guidance of the Worcestershire Safeguarding Children Partnership (WSCP). Staff must refer safeguarding concerns to the Designated Safeguarding Lead and the Deputy Safeguarding Leads, who will determine the appropriate course of action in accordance with Worcestershire threshold guidance. Referrals to Children's Social Care are made via the Family Front Door (01905 822666). Out-of-hours concerns should be referred to the Emergency Duty Team (01905 768020). In cases of immediate danger, staff must contact the police by dialling 999. Professional disagreements regarding safeguarding decisions will be managed through the Worcestershire Escalation and Professional Challenge Procedure.

1.7.7 Staff must be particularly alert where a child has been repeatedly removed from the classroom, is on a part-time timetable, is frequently absent or missing, or may be at risk of modern slavery, exploitation, serious violence, radicalisation, parental offending or domestic abuse. Concerns must be considered cumulatively and not in isolation.

1.7.8 Staff must recognise that abuse can include child-to-parent or child-to-caregiver abuse and that safeguarding concerns frequently overlap. Repeated lower-level concerns, absences, exclusions, changes in behaviour or contextual information must be viewed cumulatively and recorded so the DSL can identify patterns, risks and support needs.

1.7.8 Early-help assessments and plans must be child-centred, coordinated, recorded and reviewed. The child's lived experience, wishes and feelings must inform decisions, including decisions to provide support for both a child harmed and a child alleged to have caused harm.

We give special consideration to children who:

i. Have special educational needs and/or disabilities (SEND) or health conditions (see section 10)
ii. Are young carers
iii. May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
iv. Have English as an additional language
v. Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
vi. Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
vii. Are asylum seekers
viii. Are at risk due to either their own or a family member's mental health needs
ix. Are looked after or previously looked after (see section 12)
x. Are missing or absent from education for prolonged periods and/or repeat occasions
xi. Whose parent/carer has expressed an intention to remove them from school to be home educated
xii. Are pregnant and/or are parents themselves.
xiii. Have exhibited early signs of abusive, violent and/or harmful behaviour.
xiv. Are repeatedly removed from classrooms, on a part-time timetable, have experienced multiple suspensions, are at risk of permanent exclusion, or attend alternative provision or a pupil referral unit.
xv. Have caring responsibilities as young carers.
xvi. Have medical conditions, including allergies, which may increase vulnerability where essential information, medication or care is not provided.

- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage

- is a privately fostered child.

We ensure where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs.
Before placement and throughout the placement, the commissioning school retains responsibility for safeguarding and promoting the pupil's welfare. It must assure itself of the provider's suitability, safeguarding arrangements, attendance monitoring, welfare contact, curriculum, risk assessment, information sharing, review and reintegration arrangements.
The Headteacher (Mrs Tanya Howarth) is the school's Named Alternative Provision Lead and is responsible for ensuring that any alternative provision placement meets the requirements of safeguarding, attendance, quality assurance and educational provision. Prior to placement, safeguarding and suitability checks will be completed. Attendance will be monitored daily, and regular reviews of pupil welfare, attendance, progress and safeguarding will be undertaken. Any safeguarding concerns arising within alternative provision will be referred immediately to the Designated Safeguarding Lead. Where concerns cannot be resolved, matters will be escalated to the Headteacher, Trust safeguarding lead and Children's Social Care as appropriate.
Schools will recognise and work proactively with the Virtual School Head where appropriate to promote the education, attendance, wellbeing and safety of children with a social worker and care-experienced children.

The cohort of pupils in Alternative Provision often have complex needs, it is important that governing bodies and proprietors of these settings are aware of the additional risk of harm that their pupils may be vulnerable to.

The department has issued two pieces of statutory guidance to support schools with this https://www.gov.uk/government/publications/alternative-provision - DFE statutory guidance and https://www.gov.uk/government/publications/education-for-children-with-health-needs-who-cannot-attend-school - DFE statutory guidance

2 Procedures

2.2.7A The school will maintain a named DSL and appropriately trained deputies who are available during school hours to discuss safeguarding concerns. Robust absence and cover arrangements will include clear handover, visibility of urgent concerns, secure access to relevant records and a confidential shared safeguarding mailbox or equivalent secure mechanism.

2.2.7B The Designated Safeguarding Lead (DSL) for Feckenham CE Primary School is **Mrs Tanya Howarth]**. The Deputy Designated Safeguarding Leads are **Mrs Catherine O'Donnell and Miss Iona McQueen**

A member of the safeguarding team will be available during all school operating hours to discuss safeguarding concerns, make referrals and provide advice and support to staff. Daily safeguarding cover arrangements are communicated to staff through **staff briefing and Outlook calendar]**.

Safeguarding concerns should be reported immediately via **CPOMS** and brought directly to the attention of the DSL or Deputy DSLs where there is a risk of immediate harm.

The school's safeguarding contact email is **thowarth@fps.shiresmat.org.uk**

Outside normal school hours, where there is an immediate safeguarding concern, staff should contact the Police by dialling **999**, Worcestershire Children's Social Care via the Family Front Door on **01905 822666**, or the Emergency Duty Team on **01905 768020** where the concern cannot safely wait until the next working day.

In the exceptional circumstance that neither the DSL nor a Deputy DSLs are available, staff must not delay action. Any member of staff may make a referral directly to Children's Social Care, the Police or other relevant agencies where there are concerns that a child is at risk of harm. The DSL should be informed of any action taken at the earliest opportunity.

2.1 We will follow the procedures set out by the local safeguarding partners and take account of guidance issued by the Department for Education (DfE). Where we identify children and families in need of support, we will carry out our responsibilities in accordance with the local safeguarding partner and local inter-agency procedures and levels of need guidance, liaising with the safeguarding partner and working with other agencies.
This includes West Midlands Child Protection and Safeguarding link below:
West Midlands Child Protection and Safeguarding:

Worcestershire:

https://www.worcestershire.gov.uk/safeguardingchildren

WCF levels of need guidance:

Worcestershire Children First Early Help information page

2.2 **Complaints of abuse**

2.2.1 Every complaint or suspicion of abuse from within or outside the Academy, which relates to pupils of the Academy, will be taken seriously and action will be taken in accordance with this policy

2.2.2 The Child Protection training provided to staff considers the types and signs of abuse staff

should be aware of. Further details are set out in **Annex 1**

2.2.3 Every member of staff, including supply staff, trainee teachers and volunteers working with children at our Academy, is advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child and have a responsibility to take action as outlined in this policy. They should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe.

2.2.4 If a member of staff or visitor to the Academy is concerned that a pupil may be at risk of, or suffering, harm, or receives a disclosure of abuse, the matter should be referred to the Designated Safeguarding Lead (DSL) as soon as possible, or, if unavailable, to a Deputy DSL. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff or Children's Social Care

2.2.5 Children reporting abuse, exploitation or neglect will be reassured that they are being taken seriously, supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and should never be made to feel ashamed for making a report.

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

2.2.7 All concerns about a child or young person should be reported without delay and recorded in writing. The Academy uses a software package called CPOMS to support safeguarding reporting. CPOMS is a safe and secure method of recording and managing all safeguarding concerns and meets all DfE statutory guidance and school inspection standards. Staff should report any concern using this online reporting system. Any original notes should be signed, dated and attached to the child's CPOMS file. The DSL and Deputy DSLs are automatically notified when a report is made. Any questions about the use of CPOMS should be directed to the DSL. If a concern is not able to be logged on CPOMS due to technical or other reasons, it must be recorded in writing using the Academy's agreed paper template (see Annex 3). If the agreed template form is unavailable, or it would prevent the child disclosing should the member of staff have to go and find the form, then contemporaneous notes can be made on a piece of paper, providing it has the date and time, is signed, and the note kept with all subsequent information on the child.

2.2.8 Following receipt of any information raising concern, the DSL will consider what action to take and seek advice from Children's Social Care as required. All information and actions taken, including the reasons for any decisions made, will be fully documented. All referrals will be made in line with local procedures as detailed on the local safeguarding partners website

2.2.9 All staff are encouraged to report any concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or

disclosure of abuse. More often, however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this policy to allow the DSL to build up a picture and access support for the child at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

2.2.10 If, at any point, there is a risk of immediate serious harm to a child a referral should be made to Children's Social Care immediately. Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration by raising concerns again with the DSL and/or Headteacher. Concerns should always lead to help for the child at some point.

2.2.11 Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with Children's Social Care or the police, if the situation is an emergency and the DSL, their deputy and the Headteacher are all unavailable, or if they are convinced that a direct report is the only way to ensure the pupil's safety.

2.2.12 Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy, should raise their concerns with the Headteacher or the Chair of Governors. If any member of staff does not feel the situation has been addressed appropriately at this point, they should contact Children's Social Care directly with their concerns.

2.2.13 It is not the responsibility of Academy staff to investigate welfare concerns or determine the truth of any disclosure or allegation. However, all staff have a duty to recognise concerns and pass on the information in accordance with the procedures outlined in this policy.

2.2.14 All staff are particularly reminded:

- from October 2015, teachers must report to the police cases where they discover that an act of Female Genital Mutilation appears to have been carried out. The only exception to reporting is where a teacher knows that another teacher or healthcare professional has already made a report relating to this specific incident. The duty does not apply where a pupil is 18 or over. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve Children's Social Care as appropriate:
- normal referral processes must be used when there are concerns about children who may be at risk of being drawn into terrorism.
- Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

2.3 **Action by the Designated Safeguarding Lead**

2.3.1 On being notified of a complaint or suspicion of abuse, the action to be taken by the DSL will take into account:

- the local inter-agency procedures of the local safeguarding partners;

- where relevant, local information sharing protocols relating to Channel referrals;
- the nature and seriousness of the suspicion or complaint. A complaint involving a serious criminal offence, including the identification of someone who may already be engaged in illegal terrorist activity, will always be referred to Children's Social Care services, and if appropriate the police;
- the child's wishes and feelings (having due regard to the duty to report to the police information which would be of material assistance in detecting terrorism); and
- duties of confidentiality, so far as applicable.

2.3.2 If there is room for doubt as to whether a referral should be made, the DSL may consult with Children's Social Care on a no names basis without identifying the family. However, as soon as sufficient concern exists that a child may be at risk of significant harm, a referral to Children's Social Care services will be made without delay (and in any event within 24 hours) using the local systems in place.

2.3.3 If the initial referral is made by telephone, the DSL will confirm the referral in writing to Children's Social Care services within 24 hours. If no response or acknowledgment is received within three working days, the DSL will contact Children's Social Care services again.

2.3.4 In circumstances where a pupil has not suffered and is not likely to suffer significant harm but is in need of additional support from one or more agencies, the DSL will liaise with Children's Social Care and where appropriate an interagency assessment will take place, including use of the Common Assessment Framework and Team Around the Child approaches, as necessary. Decisions to seek such support for a pupil will be taken in consultation with parents unless there are reasonable grounds for suspecting that in doing so, the pupil will be at risk of significant harm.

2.3.5 Where relevant, the Academy will co-operate with the Channel Panel and the police in providing any relevant information so that each can effectively carry out its functions to determine whether an individual is vulnerable to being drawn into terrorism. The Academy will respond to requests for information from the police promptly and in any event within five to ten working days.

2.3.6 All information and actions taken, including the reasons for any decisions made, will be fully documented on CPOMs.

2.4 Dealing with safeguarding concerns and allegations against staff, governors, supply staff trainee teachers and volunteers.

2.4.1 The Academy has procedures for dealing with safeguarding concerns and allegations against staff, governors, supply staff and volunteers who work with children that aim to strike a balance between the need to protect children from abuse and the need to protect staff, governors, supply staff and volunteers from false or unfounded allegations. These procedures are set out in our separate Abuse Allegations Procedures (see also section 18 of this policy) and follow the DfE guidance found in Part 4 of Keeping Children Safe in Education.

2.4.2 The Local Authority has designated a particular officer, or team of officers, to be involved in the management and oversight of allegations against people that work with children (Designated Officer(s)). The Designated Officer(s) will be informed immediately and in any event within one working day of all allegations against staff, governors, supply staff and volunteers that come to the Academy's attention and appear to meet the criteria set out in our Allegations Abuse Procedures.

2.4.3 The Academy will report to the DBS where permission has been withdrawn for a teacher, member of staff, supply staff or volunteer to teach or where permission would have been withdrawn if the teacher had not left, where that teacher, member of staff, supply staff or volunteer posed a risk of harm to or had harmed children. The referral will be made as soon as possible, usually on conclusion of an investigation when an individual has been removed from regulated activity.

2.4.4 **Shires Early Years Foundation Stage (EYFS)**

2.4.4.1 The Academy will inform Ofsted of any allegations of serious harm or abuse by any person living with, working with or looking after children on the premises of the Early Years (whether that allegation relates to harm or abuse committed on the premises or elsewhere), and will provide details of the action taken in respect of those allegations.

2.4.4.2 These notifications will be made as soon as reasonably practicable, but in any event within 14 days of the allegations being made.

2.4.5 Detailed guidance is given to staff, governors, supply staff and volunteers to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. This guidance is contained in Shires Multi Academy Trust Staff Code of Conduct.

2.5 **Allegations against pupils**

2.5.1 Allegations against pupils should be reported in accordance with the procedures set out in this policy. A pupil against whom an allegation of abuse has been made may be suspended from the Academy during the investigation and the Academy's policy on behaviour, discipline and sanctions will apply.

2.5.2 The Academy will take advice from Children's Social Care services on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse.

2.5.3 Where a child discloses safeguarding allegations against another pupil in the same setting, the DSL should refer to the procedures on the local safeguarding partners website and seek advice from Children's Social Care before commencing its own investigation or contacting parents. In cases of sexual violence and sexual harassment the guidance in Annex 11 of this policy should be followed.

2.5.4 Where an allegation is made against a pupil, both the victim and the perpetrator will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed.

2.6 **Informing parents**

2.6.1 We recognise that good communication with parents is crucial in order to safeguard and promote the welfare of ch**ildren** effectively. We will ensure that parents have an

understanding of the responsibilities placed on the Academy and staff to safeguard children and their duty to co-operate with other agencies in this respect.

2.6.2 Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult the Headteacher, the Local Authority Designated Officer, Children's Social Care services and/or the police before discussing details with parents. We will undertake appropriate discussion with parents prior to involvement of another agency, ***unless to do so would place the child or an adult at further risk of harm or would impede a criminal investigation***. See section 5 for further details on information sharing and confidentiality.

2.6.3 In relation to Channel referrals, the DSL will consider seeking the consent of the pupil (or their parent/guardian) when determining what information can be shared. Whether or not consent is sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public.

2.6.4 See also Abuse Allegations Procedures for details about the disclosure of information where an allegation has been made against a member of staff, governor, supply staff, volunteer or the Headteacher of the Academy.

3 Responsibilities and Duties

3.1 Legislation places general and specific responsibilities to ensure effective safeguarding in the Academy and the wider trust as a whole, as well as specific duties on the relevant boards, the DSL and Headteachers/Heads of School.

3.2 **General Duties**

3.2.1 The Academy will take reasonable measures to:

3.2.2 The Trust Board, local governing committees and school leaders will ensure that each locally approved policy reflects the school's context and clearly states: DSL and reporting arrangements; early-help and Family Help routes; local authority and LADO contacts; allegations and low-level concerns processes; child-on-child abuse process; online safety, filtering and monitoring; mobile phones; alternative provision; SEND; medical conditions; attendance and children missing education; sport and premises users; safer recruitment; information sharing and record keeping.

3.2.3 The Local Governance Committee, for Feckenham CE Primary School, has reviewed this policy and confirms that all school-specific information, contacts, roles, procedures and referral routes contained within the policy have been completed, checked for accuracy and were current at the time of approval.

3.2.1.1 establish and maintain an environment where children feel safe, secure, valued and respected and are encouraged to talk, believing they will be listened to;

3.2.1.2 ensure children know that there are adults in the Academy whom they can approach if they are worried;

3.2.1.3 include opportunities in the curriculum, specifically through Relationships Education/Relationships and Sex Education (compulsory from September 2020 - **Statutory guidance: <u>relationships and sex education (RSE) and health education.</u>**
- and ICT, for children to develop the skills they need to recognise and stay safe from abuse and to know who they should turn to for help;

3.2.1.4 ensure children who are LGB and gender questioning have support of a trusted adult to reduce any
additional barriers faced and provide a safe space for them to speak out or share their concerns with a member of staff;

3.2.1.5 ensure LGB and gender questioning inclusion is part of the statutory Relationships Education,
Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.

3.2.1.6	ensure there are systems in place for children to express their views and give feedback e.g. through academy/class councils, safety questionnaires, participation in anti-bullying and online safety events;
3.2.1.7	ensure that the child's thoughts, wishes and feelings are sought and recorded on all referrals and taken into account when determining what action to take and what services to provide to protect children from harm;
3.2.1.8	ensure it has a senior leader nominated as DSL who has received appropriate training and support for this role;
3.2.1.9	ensure it has at least one member of staff who will act in the absence of the DSL (Deputy DSL);
3.2.1.10	ensure every member of staff (including temporary and supply staff and volunteers), regular visitors to our Academy and the Local Governing Body are told where to find this policy, knows the name of the DSL and any deputies and is informed of the Academy's procedures in reporting concerns and understands their role;
3.2.1.11	ensure that the DSL and/or a deputy DSL is always available to speak to during school hours and has made adequate and appropriate cover arrangements for any out of hours/out of term time activities;
3.2.1.12	ensure all staff, trainee teachers and volunteers are alert to the potential need for early help and are aware of children whose vulnerabilities may indicate a greater need and of the role they may play in supporting other agencies and professionals in an early help assessment;
3.2.1.13	ensure all staff , trainee teachers and volunteers understand their responsibilities in being alert to the signs of abuse and neglect, including the specific issues of Female Genital Mutilation (FGM), Child Sexual Exploitation (CSE), Children Missing Education (CME), Radicalisation and Extremism (Prevent) and Sexual Violence and Sexual Harassment, and maintain an attitude of 'it could happen here';
3.2.1.14	ensure all staff , trainee teachers and volunteers understand their responsibility for referring any concerns to the DSL, Deputy DSLs or other members of the Senior Leadership Team in a timely manner and are aware that they may raise concerns directly with Children's Social Care if they believe their concerns have not been listened to or acted upon;
3.2.1.15	ensure that parents have an understanding of the responsibility placed on the Academy and staff for Child Protection by setting out its obligations in the Academy prospectus and publishing its policy on the Academy website;
3.2.1.16	ensure that it receives written confirmation that the appropriate Child Protection checks and procedures have been carried out on staff from another organisation;

3.2.1.17 operate a lettings policy which ensures the suitability of adults working with children on academy sites at any time;

3.2.1.18 ensure that community users organising activities for children are aware of, and understand the need for compliance with, the Academy's Child Protection guidelines and procedures;

3.2.1.19 ensure that the duty of care towards its pupils and staff is promoted by raising awareness of illegal, unsafe and unwise behaviour and assist staff to monitor their own standards and practice;

3.2.1.20 ensure that all staff and volunteers feel able to raise concerns about poor or unsafe practice and are aware of whistleblowing procedures and helplines;

3.2.1.21 be aware of and follow procedures set out by the DfE and the local safeguarding partners where an allegation is made against a member of staff, supply staff or volunteer, including making a referral to the Local Authority Designated Officer (LADO) and ensuring that a referral is made to the DBS and/or Teaching Regulation Agency if a person in regulated activity has been dismissed or removed or suspended from regulated activity where the harm criteria is met, or would have been had they not resigned;

3.2.1.22 operate safer recruitment practice, ensuring that at least one member on every recruitment panel has completed safer recruitment training;

3.2.1.23 ensure that the content and themes of assessed performances in drama and dance are appropriate for a school setting and appropriate to the age group of the children that are performing

3.2.1.24 and regularly review and update our procedures at least annually

3.3 **Specific duties**

3.3.1 Every employee and governor of the Academy as well as every volunteer who assists the Academy is under a general legal duty to:

3.3.1.1 protect children from abuse;

3.3.1.2 be aware of the Academy's Child Protection procedures and to follow them;

3.3.1.3 know how to access and implement the Academy's Child Protection procedures, independently if necessary;

3.3.1.4 keep a sufficient record of any significant complaint, conversation or event in accordance with this policy; and

3.3.2 Any Academy staff connected to the Academy's Early Years and Later Years provisions are under an ongoing duty to inform the Academy if their circumstances change which would mean they meet any of the criteria for disqualification under the Childcare Act 2006. Staff

should refer to *Disqualification under the Childcare Act 2006* for further information about this duty and to their contract of employment in respect of their ongoing duty to update the Academy.

3.3.3 **The Board of Trustees will:**

3.3.2.1 ensure that arrangements are in place to carry out functions in respect of safeguarding and promoting the welfare of children and have regard to statutory guidance by the Secretary of State;

3.3.2.2 ensure all Academies in the Shires Academies Trust meet their duties with regard to safeguarding and Child Protection;

3.3.2.3 ensure that policies and procedures are in place for appropriate action to be taken in a timely manner to safeguard and promote children's welfare, e.g., safeguarding and child protection policy, staff code of conduct;

3.3.2.4 ensure that there are appropriate safeguarding responses to children missing from education;

3.3.2.5 ensure all Academies have a Designated Safeguarding Lead (DSL) and deputy(ies) and that they have undergone training within the last two years;

3.3.2.6 ensure that a Designated Teacher is appointed to promote the educational achievement of children who are looked after, that they have the skills, knowledge and understanding necessary to keep Looked After Children safe, and that the information they need in relation to the child's looked after status, his/her care arrangements and the levels of authority delegated to the carer by the authority looking after him/her is made available to them;

3.3.2.7 ensure that children are safeguarded from harmful and inappropriate online material by ensuring that appropriate filters and monitoring systems are in place;

3.3.2.8 ensure that children are taught about safeguarding through teaching and learning opportunities;

3.3.2.9 ensure that children's wishes and feelings are considered where there is a safeguarding concern;

3.3.2.10 ensure that there is a Single Central Record of all staff and others who work in the school;

3.3.2.11 monitor the work of the Executive Trust Lead SENCo and support and challenge matters relating to safeguarding;

3.3.2.12 ensure that any weaknesses brought to its attention relating to safeguarding are remedied without delay and it complies with all legislative duties, including the duty to report suspected or known cases of FGM and the duty to prevent young people from being drawn into terrorism;

3.3.2.13 ensure that they have the status and authority to fulfil all the roles of the individual Academy DSLs if required.

3.3.4 **The CEO will:**

3.3.4.1 monitor the delegated responsibilities for safeguarding in the scheme of delegation;

3.3.4.2 raise awareness of safeguarding issues with the Headteacher/Headteachers, the Board of Trustees and Board of Trustees lead for Safeguarding;

3.3.4.3 monitor the quality and effectiveness of safeguarding provision within the Academy and update the Headteacher/Headteachers, the Board of Trustees and the
Board of Trustees lead for Safeguarding on this;

3.3.4.4 regularly review and update the Trust safeguarding policy and related procedures and ensure that these are available on the Academy website;

3.3.4.5 undertake annual quality assurance checks relating to safeguarding at each Academy to ensure effective safeguarding practices are in place;

3.3.4.6 meet six times a year as part of the Board of Trustees duties to discuss an overview of safeguarding at each Academy;

3.3.4.7 provide information for the CEO's termly report to the Board of Trustees;

3.3.4.8 ensure the DSL and Deputy DSL role is explicit in the role holders' job descriptions and that the DSL takes lead responsibility for safeguarding and Child Protection and does not delegate this responsibility;

3.3.4.9 ensure the individual Academy DSLs are supported in fulfilling their responsibilities;

3.3.4.10 ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in part one of Keeping Children Safe in Education;

3.3.4.11 ensure that the Academy's safeguarding arrangements take into account the procedures and practice of the local safeguarding partners;

3.3.4.12 ensure that safeguarding responses are put in place in cases where children go missing from education;

3.3.4.13 ensure that senior leaders at each Academy are involved in quality assurance processes, including the analysis of referrals and concerns, enabling the Academy to be dynamic in response to identified patterns and the bespoke needs of the local community.

3.3.5 **The Local Governance Committee will:**

3.3.5.1 support the school with required actions from the termly CEO's report to the EPC;

3.3.5.2 gather pupil voice to contribute to the monitoring of priorities for safeguarding pupils;

3.3.5.3 track themes in parental complaints in relation to safeguarding;
report any serious or persistent concerns to the Board of Trustees.

a) The Governing Body will:
Facilitate a whole-school/college approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development, and that all systems, processes and policies operate with the best interests of the child at their heart.
Ensure that the school/college complies with Keeping Children Safe in Education 2026, all relevant safeguarding legislation and statutory guidance, and the locally agreed multi-agency safeguarding arrangements.
Evaluate and approve this policy at each review, ensure it is reviewed at least annually and updated whenever necessary, and hold the Headteacher/Principal to account for its effective implementation.
Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010, including the Public Sector Equality Duty, data protection laws, and the school/college's local multi-agency safeguarding arrangements.
Appoint a senior board level (or equivalent) lead Governor to monitor the effectiveness of this policy and, in conjunction with the full Governing board, to take strategic leadership responsibility for the school/college's safeguarding arrangements. This person will be different from the DSL.
Ensure that the DSL has the appropriate status, authority, skills and experience, together with sufficient time, funding, training, resources and support, and that robust and confidential cover arrangements are in place whenever the DSL is unavailable.
Ensure all staff receive appropriate safeguarding and child protection training, including online safety and filtering and monitoring, at induction; that this training is regularly updated; and that staff receive safeguarding updates as required and at least annually.
Ensure all Governors and Trustees receive appropriate safeguarding and child protection training, including online safety, at induction and that this training is updated regularly so they can provide strategic challenge and assurance.
Ensure that appropriate safeguarding policies and procedures are in place, including arrangements for child-on-child abuse, children absent from education, online safety, staff conduct, low-level concerns, allegations against staff, whistleblowing and safer recruitment.

3.3.5.4 Ensure that the school/college has appropriate and effective filtering and monitoring. This includes:

a. Ensuring that roles and responsibilities are clearly assigned, and that their effectiveness is reviewed at least once in every academic year by the responsible senior leader with support from the DSL and IT support, including recorded checks across relevant devices and locations

b. Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school/college in meeting these standards

xi. Ensure that the school/college complies with Part three of Keeping Children Safe in Education 2026 in relation to safer recruitment, selection, vetting, regulated activity, the single central record and ongoing safeguarding. This includes implementing the removal of the supervision exemption so that a person, including a volunteer, who teaches, trains, instructs or supervises children on more than three days in a 30-day period or overnight is treated as being in regulated activity even where supervised, and is subject to the legally required checks.

xii. Ensure that procedures are in place to manage any safeguarding concern or allegation, no matter how small, about staff, supply staff, trainee teachers, volunteers or contractors, including concerns that may meet the harm threshold and low-level concerns that do not.

xiii. Ensure that the Chair of Governors acts as the case manager where an allegation is made against the Headteacher/Principal, and, where required, liaises with the local authority designated officer (LADO).

xiv. Ensure that where another body provides services or activities, or uses the school/college premises, appropriate safeguarding assurance is obtained, safeguarding requirements are included in any agreement, and failure to comply may result in termination of the arrangement.

xv. Ensure that safeguarding arrangements for alternative provision are effective, including written assurance about checks, accurate records of where each child is educated, regular review of placements and immediate review where safeguarding concerns arise.

xvi. Ensure that online safety is a running and interrelated theme within the whole-school/college approach to safeguarding, including the safe use of generative artificial intelligence, mobile phones, remote education, information security and cyber security.

xvii. Ensure that the school/college's policies and practice reflect the requirements of Keeping Children Safe in Education 2026 relating to children potentially at greater risk of harm, including children with SEND or medical conditions, young carers, children who are lesbian, gay or bisexual, and children who are questioning their gender.

xviii. Ensure that appropriate arrangements are in place regarding sport, toilets, changing rooms, showers and, where applicable, boarding or residential accommodation, in accordance with statutory requirements and the safeguarding provisions in Keeping Children Safe in Education 2026.

xix. Ensure that referrals are made to the Disclosure and Barring Service and, where appropriate, the Teaching Regulation Agency when the relevant legal criteria are met.

xx. Ensure that child protection files are maintained, transferred securely and promptly, and that relevant safeguarding information is shared lawfully, proportionately and in a timely manner.

xxi. Ensure that, where reasonably possible, more than one emergency contact number is held for each pupil/student.

3.3. **The Headteacher will:**

3.3.6.

1 ensure that the safeguarding policies and procedures are fully implemented and followed by all staff;

3.3.6.2 ensure that sufficient funding, support time and resources are allocated to enable the DSL and other staff to discharge their responsibilities with regard to Child Protection;

3.3.6.3 ensure that the DSL and Deputy DSLs are made known to all staff and visitors through information on the website and in school;

3.3.6.4 ensure that all staff feel able to raise concerns about poor or unsafe practice and that these are handled sensitively and in accordance with the whistleblowing procedure;

3.3.6.5 ensure that all allegations of abuse against staff are reported to the LADO in a timely manner;

3.3.6.6 ensure that the Local Authority is informed of all deletions from the admission register when a child is taken off roll and that, where a parent/carer has expressed their intention to electively home educate their child, the school works with the LA and other key professionals to ensure the parents/carers have considered what is in the best interests of the child, particularly where a child has SEND, is vulnerable, and/or has a social worker;

3.3.6.7 respond to any concerns raised by the LGB in relation to the CEO's termly report to the Trust Board;

3.3.6.8 ensure that any returns requested by the Local Authority or local safeguarding partners are completed in a timely manner.

3.3. **The DSL will:**

3.3.7.1 Co-ordinate action on safeguarding and promoting the welfare of children within the Academy setting. Each Academy DSL has the status and authority within the Academy to carry out the duties of the post, including committing resources and supporting and directing other staff.

3.3.7.2 The DSL is responsible for:

- organising Child Protection induction training for all newly appointed staff and whole staff training, refreshed at least every 3 years with annual updates as required;
- providing a mechanism to ensure that all staff understand and are able to discharge their role and responsibilities as set out in part one of *Keeping Children Safe in Education*;
- undertaking, in conjunction with the Headteacher and Trust Lead for Safeguarding, an annual audit of safeguarding procedures;

- making use of the Levels of Need guidance when making a decision about whether or not the threshold for Early Help or Children's Social Care intervention is met;
- referring a child to Early Help and/or Children's Social Care as appropriate, when there are concerns about possible abuse and neglect;
- referring a child to the Channel Panel when there are concerns about possible radicalisation or involvement in extremist groups;
- liaising with the Headteacher/Headteacher to ensure he/she is informed of all Child Protection issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- liaising with other staff (pastoral support staff, school nurses or counsellors, IT technicians, online-safety co-ordinators, SENCos and LAC co-ordinators, Senior Mental Health Leads, etc.) on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies;
- helping promote educational outcomes by sharing relevant information with staff about the welfare, safeguarding and child protection issues that children are experiencing or have experienced with a view to better understanding how best to support these children in school;
- keeping written records of concerns and rationale about referrals or non referrals about children, including the use of body maps, even where there is no need to refer the matter immediately;
- ensuring all Child Protection records are kept securely, separate from the main pupil file, and in locked/password protected locations or as secure online CPOMS files;
- The DSL will use a documented risk-assessment approach to determine what information should be shared, with whom, why, when and how. The record will include the child's wishes and feelings, safety rationale, legal basis, information shared, decisions and outcomes.
- ensuring that all Child Protection files are transferred in a safe and timely manner when a child moves settings, both between and across phases, within and out of county and including in-year transfers, and that a receipt of transfer is obtained;
- notifying the key worker if there is an unexplained absence of more than two days of a pupil who is subject to a Child Protection plan;
- monitoring unauthorised absence, particularly where children go missing on repeated occasions, reporting concerns in line with 'missing children' procedures;
- developing effective links with relevant agencies and other professionals and co-operate as required with their enquiries regarding safeguarding matters including co-operation with serious case reviews, attendance at strategy meetings, initial and review Child Protection conferences, core group and child in need review meetings;
- contributing to assessments and providing a report to initial and review conferences which has been shared with parents first, whenever possible;
- contributing to the co-ordination of a programme of safety, health and well-being through the curriculum, including issues of protective behaviours, healthy relationships, staying safe on-line, and the promotion of fundamental British values;
- acting as a source of support, advice and expertise for all staff.

- Assess and respond to risks of serious violence, including weapon carrying or threats, putting in place safety and support plans and considering de-escalation of peer conflict where appropriate.
- Respond where a potential victim of child criminal exploitation, child sexual exploitation, trafficking or modern slavery is identified, by making an immediate child protection referral to local authority children's social care and, where appropriate, the police. The DSL will work with the relevant statutory agency to ensure that a referral to the National Referral Mechanism is considered and, where appropriate, submitted by an authorised First Responder organisation.
- Have a good understanding of harmful sexual behaviour.

- Have a good understanding of the filtering and monitoring systems and processes in place at our school/college.

The DSL will also:

i. Keep the Headteacher informed of any issues.
ii. Liaise with local authority case managers and designated officers for child protection concerns as appropriate.
iii. Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school policies.
iv. Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support.
v. Be aware that children and young people must have an 'appropriate adult' to support and help them in the case of a police investigation or search.

c) The full responsibilities of the DSL and deputy DSLs are set out in the role-holder's job description as set out by the DfE in Annex B of the current version of Keeping Children Safe in Education. The school will review the job description regularly and update it whenever required.

4 Training

4.0A Training and induction will ensure that all staff, including staff who do not work directly with children, have read and understood Part one of KCSIE in full. The Trust will retain appropriate written confirmation and provide regular opportunities for staff to receive safeguarding updates and discuss application in their role. The Part one overview is supplementary and must not be used as a substitute for Part one.

4.1 **Induction**

4.1.1 When staff join our Academy, they will be informed of the safeguarding children arrangements in place. They will be given a copy of this policy including its Annexes, Part 1 and Annex A of Keeping Children Safe in Education, the Academy's safeguarding response to children who go missing in education, the Behaviour and Discipline Policy and the Academy's Staff Code of Conduct (including low-level concerns and whistleblowing procedures) and told who the DSL is, what this role includes and who acts in their absence. Each new member of staff, or temporary or supply member of staff, will be required to sign to say they have read and understood these documents and their legal duties and responsibilities in relation to them.

4.1.2 All staff will receive induction in safeguarding children. The induction programme will include basic Child Protection information relating to signs and symptoms of abuse, how to manage a disclosure from a child, when and how to record a concern about the welfare of a child and advice on safe working practice. It will also detail the role of the DSL and his/her identity and contact details together with that of his/her Deputy DSL(s), and provide initial training on how to use CPOMS, the Academy's safeguarding reporting system. Online safety and induction training will be completed as outlined in 4.2.2.

4.1.3 All volunteers, supply staff, trainee teachers and regular visitors to the Academy will be told where our policy is kept, the name of the DSL and Deputy DSL(s) and informed of the Academy's procedures for reporting concerns.

4.2 Child Protection training

4.2.1 All Staff, including Headteacher will receive a copy of this policy and Part 1 and Annex A of Keeping Children Safe in Education, and will be required to confirm that they have read and understood these.

4.2.2 All staff will receive appropriate training in Child Protection and safe working practice, updated at least every three years. Training will include signs and symptoms of abuse and neglect, modern slavery as well as specific safeguarding issues, such as CSE, FGM, Prevent, online safety which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring and child on child abuse, including sexual violence and sexual harassment, the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods. Training will also include the early help assessment process and their role in it, identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
Training will also include how to record and report abuse, both within the Academy and to Children's Social Care. In addition, they will receive safeguarding, Child Protection updates and online safety as required, but at least annually. Training will include guidance on the duties of staff in relation to both children in need and children at risk of harm.

As part of induction, all new staff in regulated activity will:

- Meet the DSL or DDSL on first day,
- receive training on Trust policy and reporting incidents,
- Complete the relevant National College certificates specific to role including Safeguarding and online safety
- relevant cyber security courses
- NSPCC How to deal with a concern and listen to a child

All teaching staff new to Trust will complete the suite of training requirements within their first term:

- Prevent
- Domestic Abuse – National College
- Operation Encompass
- CSE – National College
- FGM
- Violence in schools – National College and
- If involved in recruitment, Safer recruitment training

4.2.3 Staff with specific responsibility for safeguarding children will undertake training at a level suitable to their role and responsibilities, updated every two years. In addition to formal training, the DSL and deputies will update their knowledge and skills via newsletters, briefings, network meetings and seminars at regular intervals, at least annually.

4.2.4 Key staff will be offered termly training on Trust specific needs in Safeguarding by Brightcore consultancy

4.2.5 Staff with leadership responsibilities will undertake further relevant training in safeguarding related issues such as CSE, FGM, Radicalisation, Child on Child Abuse, County Lines (Get Safe within Worcestershire) and Management of Allegations of Abuse and cascade the learning from this training to the rest of the staff.

4.2.6 Staff development training will also include training on online safety and, where they have not been able to access other Prevent training assessed as appropriate for them by the Academy, the online general awareness training module on Channel.

4.2.7 **All** governors and trustees will receive appropriate safeguarding and child protection training, including online, to enable them to fulfil their safeguarding responsibilities.

5 Information Sharing, Confidentiality and record keeping

5.0A Safeguarding information will be processed lawfully, fairly, securely and only where necessary, taking account of the Data (Use and Access) Act 2025, the UK GDPR, the Data Protection Act 2018 and relevant Information Commissioner's Office education guidance. Data protection law does not prevent necessary and proportionate information sharing for safeguarding purposes.

Information Sharing Advice for Practitioners' guidance All matters relating to safeguarding and child protection will be handled in accordance with data protection laws and shared on a need-to-know basis. Information sharing is vital to identifying and tackling abuse, neglect, exploitation and modern slavery and to promoting children's welfare. The school/college will have regard to the DfE's Information Sharing Advice for Practitioners, including the seven golden rules, and will support staff to exercise professional judgement.

As a school/college we ensure compliance with UK General Data Protection Regulations (UK-GDPR) through adherence to our Data Protection Policy). We ensure that all colleagues understand our principles for sharing information within the school/college, trust, and with the three safeguarding partners (and other agencies as required).

5.1 Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. As a school, we have clear powers to share, hold and use information for these purposes. We will be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children.

5.2 All personal information will be processed fairly and lawfully in line with our duties under the Data Protection Act 2018 and UK-GDPR and will be held safely and securely. Safeguarding teams across the Trust will adhere to UK-GDPR and ensure that all documents containing personal or sensitive information are handled in line with the Academy's UK-GDPR Policy. However, we recognise that this is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information must not be allowed to stand in the way of the need to safeguarding and promote the welfare of children. 'Safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data and to do so without consent where there is good reason to do so, where the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, where it cannot be reasonably expected that a practitioner gains consent, or where to gain consent would place a child at risk.

5.3 As well as allowing for information sharing, the Data Protection Act 2018 and UK - GDPR allow schools to withhold information in circumstances where it is warranted because it would put a child at risk of serious harm. This may be particularly relevant where a child is affected by domestic abuse perpetrated by a parent or carer. Schools must withhold information where a child is in a refuge or other form of emergency accommodation, and a person may harm a child or put them at risk of harm.

i. Staff will be proactive in sharing information as early as possible. Information shared will be relevant to the current safeguarding risk, necessary for the recipient to know, clearly presented, appropriately contextualised, focused and proportionate. Information will not be omitted where it may be relevant to understanding or managing risk.
ii. The school/college will apply the serious-harm test where relevant and seek independent legal advice if uncertain about withholding pupil data.

5.4 We recognise that all matters relating to Child Protection are confidential.

5.4A All concerns, discussions, actions and decisions must be recorded contemporaneously, stored securely and retained in a separate child protection file where appropriate. Records must include the rationale for decisions, including decisions not to refer.

5.4B Safeguarding concerns, actions and records are maintained using **CPOMS**. Access to safeguarding records is restricted to the Designated Safeguarding Lead (DSL), Deputy DSLs and other authorised staff on a need-to-know basis. Electronic records are protected through secure access controls and user permissions.

Where safeguarding information is shared electronically, this will be undertaken through secure systems approved by the school. Any shared safeguarding mailbox used by the school will be accessible only to authorised safeguarding personnel.

When a pupil transfers to another school or educational setting, safeguarding records will be transferred securely and separately from the main pupil file. Confirmation of receipt will be obtained and retained. Where appropriate, the DSL will discuss relevant safeguarding information directly with the receiving school's DSL to support continuity of safeguarding arrangements.

The school's Data Protection Officer (DPO) is **Miss Iona McQueen**. The school processes safeguarding information in accordance with UK data protection legislation and relevant safeguarding requirements.

Information sharing will be guided by the principles that safeguarding and promoting the welfare of children is paramount. Information will be shared lawfully, proportionately, securely and where it is necessary to protect a child or support decision-making by safeguarding agencies.

5.5 The Headteacher or DSL will disclose any information about a pupil to other members of staff on a need-to-know basis only.

5.6 All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

5.7 All staff must be aware that they cannot promise a child to keep secrets, which might compromise the child's safety or well-being.

5.8 When a child about whom concerns have been raised and recorded leaves the Academy, the DSL will consider if it would be appropriate to share information with the new school in advance of the child leaving, in order to ensure that support is in place for when the child arrives.

5.9 Any member of staff receiving a disclosure of abuse from a child or young person, or noticing signs or symptoms of possible abuse, will make notes as soon as possible (within the hour, if possible) writing down exactly what was said, using the child's own words as far as possible. Concerns will be recorded using the Academy's safeguarding children recording system.

5.10 All records of a Child Protection nature will be passed to the DSL including case conference or core group minutes, Child Protection plans and written records of any concerns. Child Protection records are kept securely with only appropriate persons having access to them.

5.11 Any referrals made to other agencies, including referrals to Children's Social Care, will be copied prior to sending and stored in the child's CPOMS file.

5.12 The DSL will maintain and regularly audit the Academy's Child Protection records and ensure that each stand-alone file includes a chronology of significant events and that information and contact details are accurate and up-to-date.

5.13 Where children leave one of our Academies, the designated safeguarding lead will ensure their child protection file is transferred to the new school as soon as possible, and **within 5 days** for an in-year transfer or within the **first 5 days** of the start of a new term to allow the new school to have support in place for when the child arrives. The designated safeguarding lead will ensure secure transit, and confirmation of receipt should be obtained if the new school does not use CPOMS, this will be transferred separately from the main pupil file.

The receiving schools should ensure key staff such as designated safeguarding leads and special educational needs co-ordinators (SENCO's) or the named persons with oversight for special educational needs and disability (SEND) in a college, are aware as required.

5.14 The DSL may copy Child Protection records generated by the Academy, including the Child Protection chronology, prior to transfer and retain for as long as is necessary (usually until the child reaches the age of 25), where there is justification for believing that the records may be required as evidence of the school's involvement with the child for statutory purposes, e.g. court cases or serious case reviews. When the records are no longer required, they will be securely disposed of.

5.15 Despite upholding confidentiality of a child's complaint or abuse where possible, there will be circumstances where the DSL and the Headteacher will need to disclose information to certain other staff and may need to refer a child to certain agencies.

5.16 The Academy is entitled to not release information under a subject access request if it deems that this would put someone at risk of harm.

5.17 In addition, see the DfE Data Protection guidance for schools Data protection in schools - Guidance - GOV.UK (www.gov.uk) which will help school staff, governors and trustees understand how to comply with data protection law.

5.18 All records must be maintained using the Trust's safeguarding software (CPOMS). DSL and DDSLs must ensure records are timely, accurate, and detailed. Training will ensure all staff understand what to record and how to do so securely.

6 Specific safeguarding issues

6.0A Safeguarding concerns often overlap. Staff must consider the cumulative impact of concerns and retain professional curiosity; no individual incident should be viewed in isolation where there may be an emerging pattern of harm.

6.0B Domestic abuse includes physical, sexual and emotional abuse, stalking and financial exploitation. It can include child-to-parent or child-to-caregiver abuse and can affect children where they see, hear or experience its effects. Emotional abuse can include persistent verbal abuse such as criticism, belittling or name-calling.

6.0C Child criminal exploitation and child sexual exploitation may be committed or facilitated by an individual, an organised network or a gang. A child may identify with, or feel loyalty to, the group exploiting them. CCE or CSE may amount to modern slavery; DSLs must consider statutory safeguarding and National Referral Mechanism duties. Victims of CSE may be criminalised for conduct they were coerced into; criminal-justice involvement never removes the need for a safeguarding response.

6.0D Most sexual abuse is perpetrated by an individual known to the victim. Staff must understand the legal distinctions between rape, assault by penetration, sexual assault and causing a person to engage in sexual activity without consent.

6.0E Child-on-child abuse, including sexual harassment and sexual violence, is preventable and must be addressed as a safeguarding issue for both the child harmed and the child alleged to have caused harm. It may include serious physical assault, coercion, threats and weapons. Responses must be trauma-informed, proportionate and must not minimise or normalise abuse.

6.0F Misogyny, misandry and other harmful prejudicial or derogatory attitudes, including online misogynistic ideology, can intersect with harmful sexual behaviour, sexual harassment, coercion, violence against women and girls, exploitation and harmful narratives. Schools will identify, record, challenge and educate about such attitudes and behaviour through safeguarding, behaviour, RSHE/PSHE and wider culture systems.

8 Private fostering arrangements

8.1 A private fostering arrangement occurs when someone other than a parent of a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or aged 18 if the child is disabled. Children looked after by the Local Authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered.

8.2 Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

8.3 Most privately fostered children remain safe and well, but safeguarding concerns have been raised in some cases so it is important that schools are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.

8.4 By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care as soon as possible.

8.5 If we become aware of a private fostering arrangement, we will check that Children's Social Care have been informed.

6.0G Mental health is a safeguarding and welfare consideration. A mental-health need may be an indicator of abuse, neglect, exploitation or other harm and may increase vulnerability. Support must be coordinated with safeguarding practice and must not replace a referral where there is a risk of harm.

If you want to strengthen the MH part bearing in mind it has had a massive update. Suggested wording below

i. Mental health problems may develop into safeguarding concerns, including self-harm, eating disorders, suicidal ideation or risk of suicide, and may also indicate that a child has suffered or is at risk of abuse, neglect or exploitation.
ii. Only appropriately trained professionals should diagnose a mental health condition. Staff are nevertheless well placed to identify potential warning signs, including significant changes in behaviour, persistent difficulty sleeping, withdrawal from social situations, loss of interest in usual activities, physical signs of self-harm or self-neglect.
iii. Staff will promote wellbeing, identify concerns early and ensure that any intervention offered by the school/college is evidence-based, safe, effective and appropriate to the child's needs and phase of education.
iv. If a mental health concern is also a safeguarding concern, staff must record it and speak to the DSL or a deputy immediately. The DSL or deputy will consider whether informing parents or carers would support the child's wellbeing and whether doing so would place the child at additional risk.
v. If staff believe a child is in immediate danger, they must call 999 or arrange for the child to attend A&E immediately with a parent/carer or another suitable person. If urgent mental health help is needed but the situation is not an emergency, staff should use NHS 111 online or call 111 and select the mental health option.
vi. If you have a mental health concern that is **not** also a safeguarding concern, speak to the Designated Senior Mental Health Lead (see key personnel section above). Mental Health concerns should also be recorded on CPOMS

6.0H Serious violence, including physical assault, threats involving weapons and violence between children, may be a safeguarding issue. Risk assessment must consider the child harmed, the child alleged to have caused harm, contextual factors, exploitation and the need for early help or statutory intervention.

6.0I Schools will identify and support young carers, recognising their caring responsibilities and potential impact on attendance, learning, wellbeing and safety.

Harmful sexual behaviour (HSB)

HSB is an umbrella term for sexual behaviours displayed by children and young people that are developmentally inappropriate and may be harmful or abusive. Sexual behaviour exists on a continuum from normal and developmentally expected behaviour, through inappropriate and problematic behaviour, to abusive and violent behaviour. HSB may occur online, face to face or both and will always be considered within a child-protection context.

When assessing behaviour, the DSL will consider the children's ages and developmental stages; the nature, frequency and pattern of the behaviour; any difference in age, power or developmental ability; coercion, intimidation or lack of consent; disability and vulnerability; the impact on the victim and others; and whether the behaviour may indicate the child displaying it has experienced abuse, trauma, unmet needs or exposure to abusive material.

The school/college will safeguard the victim and the wider pupil/student body while also providing education and appropriate safeguarding support to the child displaying HSB. Support and proportionate sanctions may occur at the same time. Specialist advice will be sought where required, and support will address underlying needs and reduce the risk of repetition or escalation.

Procedures for dealing with allegations of child-on-child abuse:

Incidents and allegations of Child-on-Child Abuse will be also dealt with in line with our separate Child-on-Child Abuse /Anti-Bullying / Behaviour Policies.

6.1 Staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the Academy and can occur between children outside the Academy. Staff, and particularly the DSL, should always consider whether children are at risk of abuse or exploitation in situations outside their families. They may be vulnerable to multiple harms including, but not limited to, sexual exploitation, criminal exploitation and serious youth violence.

6.2 **Child Abduction and Community Safety Incidents**

6.2.1 Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. It can be committed by parents, other family members, neighbours, friends, acquaintances or strangers.

6.2.2 Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents/carers, for example, people loitering nearby or unknown adults engaging children in conversation.

6.2.3 As children get older and are granted more independence, it is important they are given practical advice on how to keep themselves safe. Lessons should focus on building children's confidence and abilities, rather than simply warning them about strangers. Further information is available at www.actionagainstabduction.org and www.clevernevergoes.org

6.3 **Child on Child Abuse (including Sexual Violence and Sexual Harassment and Upskirting) (see Annex 11)**

6.3.1 We recognise that children are vulnerable to physical, sexual and emotional abuse by their peers or siblings and that it can happen inside and outside of school or online. This can include, but is not limited to: bullying (including cyber bullying, prejudice-based and discriminatory bullying), consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery), sexual violence and sexual harassment, causing someone to engage in sexual activity without consent (e.g. forcing someone to strip, touch themselves sexually or to engage in sexual activity with a third party), initiation/hazing type violence and rituals, and physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm. Child on child abuse also includes abuse within intimate partner relationships where abusive behaviour can take the form of physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological, emotional or other abuse. It also includes upskirting, which typically

involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. This is a criminal offence. Abuse perpetrated by children can be just as harmful as that perpetrated by an adult, so it is important to remember the impact on the victim of the abuse as well as to focus on support for the child or young person exhibiting the harmful behaviour. Such abuse will always be taken as seriously as abuse perpetrated by an adult and the same safeguarding children procedures will apply in respect of a child who is suffering or likely to suffer significant harm; staff must never tolerate or dismiss concerns relating to child on child abuse and such abuse must never be passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys will be boys' as this can lead to a culture of unacceptable behaviours and an unsafe environment for children. The Trust will use the latest advice Behaviour in schools - GOV.UK (www.gov.uk) and ensure this is embedded within school

6.3.2 We will ensure, through training, that staff, volunteers and governors will have an understanding of the range of child on child abuse, including sexual violence and sexual harassment, and will be made aware of how to recognise and challenge inappropriate behaviours between peers that are abusive in nature. We understand that even if there are no reports of this type of abuse, it does not mean it is not happening. Staff will be given the skills to identify and manage harmful sexual behaviour using resources such as the Brook Traffic Light Tool. Staff should be aware that it is more likely that girls will be victims and boys perpetrators, and that some groups are potentially more at risk, for example girls, children with SEND and LGB and gender questioning children, but all child on child abuse is unacceptable and will be taken seriously. Staff will also consider ,that a pupil/student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

6.3.3 Where the abuse is physical, verbal, bullying or cyber-bullying, recording of such incidents and sanctions will be applied in line with our behaviour and discipline and anti-bullying policies.

6.3.4 Where a child discloses safeguarding allegations of a sexual nature against another pupil in the same setting, the DSL should refer to the guidance on sexual violence and sexual harassment in Annex 11. Where there is Children's Social Care or police involvement, the DSL should seek advice from these agencies before commencing their own investigation or contacting parents. This may mean, on occasions, that the school is unable to conduct its own investigation into such incidents. All such incidents will be recorded using CPOMS.

6.3.5 Reports of sexual violence or sexual harassment will be responded to in line with Part 5 of Keeping Children Safe in Education.

6.3.6 Support for the victims of abuse will be in line with support outlined in the school's behaviour and discipline and anti-bullying policies. For victims of sexual abuse, the Academy should follow advice given by Children's Social Care and consider using external agencies to support any strategies that they may be able to provide within school.

6.3.7 Depending on the nature of abuse, the Academy may need to consider providing measures to protect and support the victim, the alleged perpetrator(s), staff and/or other pupils in the school by means of a risk assessment (see Annex 15 for a template). The risk assessment should be recorded and kept under review.

6.3.8 In line with managing internally, the school or college may decide that the children involved do not require referral to statutory services but may benefit from early help. Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence. It is particularly important that the designated safeguarding lead (and their deputies) know what the local early help process is and how and where to access support. More information on early help is set out in Part one of this guidance with full details of the early help process in
Working together to safeguard children - GOV.UK (www.gov.uk)

6.4 **Children and the Court System**

6.4.1 Children are sometimes required to give evidence in criminal courts for crimes committed against them or for crimes they have witnessed. Young witness guides are available to support children aged 5-11 and aged 12-17.

6.4.2 Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. The child arrangements information tool provides information on the dispute resolution service, which may be useful for some parents/carers.

6.5 **Children with Family Members in Prison**

6.5.1 These children are at risk of poor outcomes, including poverty, stigma, isolation and poor mental health. NICCO provides information to support professionals working with these children, to help mitigate negative consequences for them.

6.6 **Children Missing from Education (CME)** (see Annex 4)

6.6.1 The Academy recognises that a child going missing from education is a potential indicator of abuse or neglect. The procedures in this policy will be followed when dealing with children who go missing from education, particularly on repeat occasions, to help to identify the risk of abuse and neglect, including mental health problems, female genital mutilation or forced marriage, sexual abuse or exploitation, risk of substance abuse, risk of travelling to conflict zones and child criminal exploitation including involvement in county lines, and to help prevent the risks of them going missing in the future.

6.6.2 Our procedures for dealing with children that go missing from education are based on Local Authority and local safeguarding partner procedures. Staff are made aware of these procedures at induction and through our attendance policy. We will make every attempt to obtain more than one emergency contact number for each child registered at the school to ensure we are able to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern.

6.6.3 The Academy shall inform the applicable local authority of any pupil who fails to attend the Academy regularly, or has been absent without the Academy's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the Academy and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

6.6.4 Where a child is going to be added to or deleted from the pupil roll, the Academy will inform the Local Authority in which the child resides in the applicable circumstances. We will inform the Local Authority when removing a child from the pupil roll at non-standard transition points.

6.7 **Child Criminal Exploitation (CCE)** (see Annex 6)

6.7.1 CCE is a form of abuse where an individual or group (male or female, children or adults), takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity in exchange for something the victim wants or needs and/or for the financial advantage or increased status of the perpetrator(s) or facilitator(s) and/or through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE can occur through the use of technology and does not always involve physical contact. The abuse may be a one-off occurrence or a series of incidents over time and can range from opportunistic to complex organised abuse. It can affect males and females and can include children who have been moved for the purpose of exploitation, commonly referred to as trafficking. Both boys and girls being criminally exploited may also be at higher risk of sexual exploitation.

6.7.2 CCE can involve children being forced or manipulated to work in cannabis factories, transport drugs or money across the country (see 6.8 for County Lines), shoplift or pickpocket, commit vehicle crime or threaten or commit serious violence to others. Children can become trapped by CCE as perpetrators can threaten them and their families.

6.7.3 Indicators of CCE include children who: may appear with unexplained gifts or new possessions; associate with other young people involved in exploitation; suffer from changes in emotional wellbeing; misuse drugs and alcohol; go missing for periods of time or regularly come home late regularly miss or do not take part in school. Children involved in CCE often commit crimes themselves and, as such, are not always recognised as vulnerable or as victims. They may still have been criminally exploited even if they appear to have consented or agreed to an activity.

6.8 **County Lines** (see Annex 6)

6.8.1 This is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs to other areas of the UK using dedicated mobile phone lines or other form of 'deal line'. This activity can also happen locally.

6.8.2 Exploitation is an integral part of the county lines offending model where offenders use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance. Typically, the gang exploits young or vulnerable people to move, store and/or sell drugs and money and secure the use of homes belonging to vulnerable adults. There is a crossover between CSE and county lines and young people are sometimes required to offer sex in order to pay off perceived debts.

6.8.3 Children can be targeted and recruited into county lines in a number of locations, including at school and increasingly online using social media, and can easily become trapped by this type of exploitation as gangs can create drug debts and threaten serious violence and kidnap towards victims and their families if they attempt to leave

the county lines network. Concerns about young people possibly being involved should be passed to the DSL who will refer to Police and Children's Social Care and may also consider other local services who offer support to victims of county lines exploitation.

6.8.4 A referral to the National Referral Mechanism should be considered if a child is suspected to have been trafficked for the purpose of transporting drugs. One of the ways of identifying this are missing episodes from both home and school.

6.9 **Child Sexual Exploitation (CSE)** (see Annex 5)

6.9.1 We recognise that CSE is a form of child sexual abuse involving criminal behaviours against children and young people which can have a long-lasting adverse impact on a child's physical and emotional health. Sexual exploitation involves an individual or group taking advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity. Victims can be boys or girls and can include children who have been moved for the purpose of exploitation, commonly referred to as trafficking. Children and young people are often unwittingly drawn into sexual exploitation through the offer of something they need or want, for example: friendship and care; gifts; drugs and alcohol; and sometimes accommodation. It can also be for the financial advantage or increased status of the perpetrator(s) or facilitator(s) and/or through the threat of violence. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact, it can also occur through the use of technology and it may also occur without the child or young person's immediate knowledge. The abuse may be a one-off occurrence or a series of incidents over time, and can range from opportunistic to complex organised abuse.

6.9.2 The Academy addresses the risks of sexual exploitation in the RSHE curriculum. A common feature of sexual exploitation is that the child often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

6.9.3 All staff, trainee teachers volunteers and governors are made aware of the indicators of sexual
exploitation, the fact that the victim may have been sexually exploited even if the sexual activity appears consensual, and that it does not always involve physical contact but can occur through the use of technology. All concerns of CSE are reported immediately to the DSL.

6.10 **Cybercrime**

6.10.1 Cybercrime is criminal activity committed using computers and/or the Internet and includes cyber-enabled crimes such as fraud, buying illegal drugs online and CSE and cyber-dependent crimes such as unauthorised access to computers (illegal 'hacking'), denial of Service attacks of 'booting' and making, supplying or obtaining malware such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

6.10.2 Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cybercrime. If a concern relating to cybercrime is reported, the DSL should consider a referral to the Cyber Choices programme.

6.11 **Domestic Violence/Abuse** (see Annex 7)

6.11.1 Domestic violence and abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to, psychological, physical, sexual, financial and/or emotional abuse. It includes intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.

6.11.2 Children and young people can be victims of domestic abuse in their home life, including in the context of witnessing domestic abuse occurring between other family members, but also within their own intimate personal relationships. We recognise that exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. We will ensure that our pupils are educated so that they understand what a healthy relationship looks like. All concerns regarding Domestic Abuse will be reported to the DSL, who will ensure that appropriate support is available to the child/children and make referrals to Children's Social Care where the threshold for social care intervention is met.

6.11.3 Our Academy receives Operation Encompass notifications. Operation Encompass highlights that a domestic abuse incident has taken place where there are children in the household and that the police have been called or have visited the family home. It ensures our staff have up to date and relevant information about the child's circumstances and enables support to be given according to need. Further information on Operation Encompass and how schools will use the notifications is available from the DSL.

6.12 **Homelessness**

6.12.1 Being homeless or at risk of becoming homeless presents a real risk to a child's welfare. The DSL should be aware of contact details and referral routes into their Local Housing Authority so they can raise or progress concerns at the earliest opportunity. The Homelessness Reduction Act 2017 places a legal duty on English councils so that everyone who is homeless or at risk of homelessness has access to meaningful help, including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. Any such referral should not replace a referral to Children's Social Care where a child has been harmed or is at risk of harm.

6.12.2 Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. In most cases, Academy staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should be recognised that in some cases 16 and 17 year olds could be living independently from their parents or guardians and will require a different level

of intervention and support. Children's Social Care should be the lead agency for these young people.

6.13 **'Honour Based' Abuse (HBA) (see Annex 9 and Annex 10)**

6.13.1 So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse, regardless of the motivation, and should be handled and escalated as such.

6.13.2 We recognise that our staff are well placed to identify concerns and take action to prevent children from becoming victims of FGM and other forms of HBA and provide guidance on these issues through our safeguarding training. If staff have a concern regarding a child who has suffered or might be at risk of HBA they should inform the DSL who will activate local safeguarding partner procedures, using existing national and local protocols for multiagency liaison with police and Children's Social Care.

6.13.3 Where FGM has taken place, since 31st October 2015 there has been a mandatory reporting duty placed on teachers or other persons employed or engaged to carry out teaching work. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by Section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to personally report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. We will provide guidance and support to our teachers on this requirement and further information on when and how to make a report can be found in the following Home Office guidance: 'Mandatory Reporting of Female Genital Mutilation - procedural information' (October 2015). See Annex 9 for further information.

6.13.4 Breast ironing, also known as breast flattening, is the pounding and massaging of a pubescent girl's breasts using hard or heated objects to try to stop them developing, or to make them disappear entirely. Much like FGM, breast ironing is a harmful cultural practice and while there is no specific law within the UK around breast ironing, it is a form of physical abuse. If staff are concerned that a child may be at risk of, or is suffering, significant harm, they should inform the DSL.

6.13.5 A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Forced marriage is a crime in England and if staff are concerned that a child may be at risk of or have been forced into a marriage, they should inform the DSL. The Forced Marriage Unit can be contacted for advice or information on 020 7008 0151 or via fmu@fco.gov.uk See Annex 10 for further information.

6.14 **Mental Health**

6.14.1 We aim to help prevent mental health problems by promoting resilience as part of a whole school approach to social and emotional wellbeing.

6.14.2 We recognise that mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are well-placed to observe children day-to-day and identify those whose behaviour suggests they may be experiencing, or be at risk of developing, a mental health problem. However, only appropriately trained professional should attempt to make a diagnosis

6.14.3 Where children have suffered abuse and neglect or other potentially traumatic adverse childhood experiences (ACEs), this can have a lasting impact throughout childhood and adolescence and into adulthood. We are aware of how these ACEs can impact on a child's behaviour and attendance, and that these children have a high prevalence of mental health and/or special educational needs.

6.14.4 If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the reporting procedures outlined in this policy

6.15 **Modern Slavery**

6.15.1 The Modern Slavery Act 2015 places a statutory duty on public authorities, including schools, to notify the National Crime Agency (NCA) (section 52 of the Act) on observing signs or receiving intelligence relating to modern slavery. The public authority, including schools, bears this obligation where it has 'reasonable grounds to believe that a person may be a victim of modern slavery or human trafficking'. Staff need to be aware of this duty and inform the DSL should they suspect or receive information that either parents/carers or their children may be victims of modern slavery. The DSL will then contact the NCA

6.15.2 Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can also take the form of sexual exploitation, forced criminality and the removal of organs

6.15.3 The National Referral Mechanism is a framework for identifying victims of human trafficking and ensuring they receive the appropriate protection and support.

6.16 **Radicalisation and Extremism (see Annex 8)**

6.16.1 We are subject to the Prevent Duty under section 26 of the Counter-Terrorism and Security Act 2015, which requires us to identify children who may be vulnerable to radicalisation and know what to do when they are identified. We recognise that children are vulnerable to extremist ideology and radicalisation and that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society.

6.16.2 The DSL has received Prevent training and will act as the point of contact within our Academy for any concerns relating to radicalisation and extremism. The DSL will make referrals in accordance to local safeguarding partner procedures and will represent the

Academy at Channel meetings as required.

6.16.3 If a staff member, governor or volunteer becomes concerned about a child in relation to radicalisation or extremism, they will follow the procedures set out in Annex 8 of this document.

6.16.4 All staff, governors, supply staff trainee teachers and volunteers will be given training in respect of
having an understanding of what radicalisation and extremism are, why we need to be vigilant in school, and identifying and reporting concerns about a child and their individual obligations under the prevent duty.

6.16.5 We aim to help provide resilience to radicalisation by encouraging pupils to respect the fundamental British values of democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs. We ensure that partisan political views are not promoted in the teaching of any subject in the Academy and where political issues are bought to the attention of the pupils, reasonably practicable steps have been taken to offer a balanced presentation of opposing views to pupils.

6.16.6 We value freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values. Both pupils and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

6.16.7 We seek to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, Far Right/Neo Nazi/White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

6.16.8 There are systems in place for keeping pupils safe from extremist material when accessing the internet in our school by using effective filtering and usage policies this filtering and monitoring is supported by SENSO and Smoothwall across the trust underpinned by Concero IT. All processes are inline with the filtering and monitoring standards in KCSIE.

6.16.9 We will use relevant information, tools and resources to help staff and parents/carers recognise and address extremism and radicalisation in young people, for example the Educate Against Hate website

6.17 **Serious violence**

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

6.17.2 Staff should be aware of the risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been Preventing Youth Violence and Gang Involvement and Criminal Exploitation of Children and Vulnerable Adults: County Lines.

6.18 **Local Issues**

6.18.1 Within our local area, statistics show that violence & sexual offences, anti-social behaviour, public order and criminal damage/arson, are the most committed crimes and therefore are a particular focus for our Academy (data taken from www.crime-statistics.co.uk, June 2022)

6.18.2 The Local safeguarding risks for our school are wellbeing following COVID19 – we address and minimise these risks by:
• Highlighting support available – school counsellors, and wellbeing local support alongside covering relevant guidance topics through assemblies and RSHE

7 Looked after children and previously looked after children

7.0A The designated teacher and DSL will recognise the role of the Virtual School Head in promoting the education, attendance, wellbeing and safety of children with a social worker and care-experienced children, and will work proactively with the Virtual School Head where appropriate.

7.1 The most common reason for children becoming looked after is as a result of abuse or neglect. The Academy ensures that staff have the necessary skills, knowledge and understanding to keep Looked After Children safe. Appropriate staff have information about a child's looked after legal status and contact arrangements with birth parents or those with parental responsibility. They also have information about the child's care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The Designated Teacher for Looked After Children and the DSL have details of the child's social worker and the name and contact details of the Local Authority's Virtual Head for children in care and previously looked after children.

7.2 The Academy's Designated Teacher for Looked After Children and Previously Looked After Children has the appropriate training and experience of working with this group of children

7.3 We recognise that a previously looked after child potentially remains vulnerable and therefore ensure that staff have the skills, knowledge and understanding to keep previously looked after children safe.

7.4 The Designated Teacher for Looked After Children and the DSL will obtain details of the Local Authority Personal Adviser appointed to guide and support each care leaver and will liaise with them as necessary regarding any issues of concern affecting the care leaver.

9. Special educational needs and disability (SEND) and physical health issues

9.0A Children with SEND may face additional barriers to recognising abuse, communicating concerns, accessing support and being believed. Schools will make reasonable adjustments, use accessible safeguarding processes and avoid assuming that behaviour, communication needs or disability explain away a concern.

9.0B Each school will maintain robust arrangements for safeguarding children with medical conditions, including appropriate information sharing, individual healthcare plans, medication and care arrangements, emergency procedures, training and links with health professionals.

9.0C The school recognises the close relationship between safeguarding, mental health, SEND, attendance, medical needs and pupil welfare.

The school's **Mental Health Lead** is **Mrs Iona McQueen**. The school's **SENDCo** is **Miss Iona McQueen**.

The school supports pupils with medical needs through appropriate healthcare arrangements, risk assessments, care plans and the administration of medicines where required.

Where concerns are identified regarding a pupil's mental health, emotional wellbeing, special educational needs, caring responsibilities or medical needs, staff should raise these concerns with the appropriate lead and the Designated Safeguarding Lead where safeguarding concerns are also present.

Support may be provided through school-based interventions, Early Help services, health services, specialist SEND services, mental health support services, Children's Social Care or other appropriate agencies. Referral decisions will be made in the best interests of the child and, where appropriate, in partnership with parents and carers.

The school recognises that some pupils may have caring responsibilities at home. Where a child is identified as a young carer, appropriate support will be coordinated by the SENDCo and/or Designated Safeguarding Lead and referrals made to relevant support services where appropriate.

9.1 We recognise that children with Special Educational Needs and Disabilities or physical health issues can face additional safeguarding challenges and these are discussed in staff training. These additional barriers can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- being more prone to peer group isolation or bullying than other children;
- children with SEND or certain medical conditions can be disproportionately impacted by behaviours such as bullying without outwardly showing any signs;
- communication barriers and difficulties in overcoming these barriers.
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

9.2 We will always consider extra pastoral support for children with SEND to address these additional challenges.

10 Racist Incidents

10.1 Our policy on racist incidents is set out in a separate policy (anti-bullying policy) and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under Child Protection procedures. We maintain a log of racist incidents in school on our Safeguarding software.

11 Anti-bullying

11.1 Our policy on anti-bullying is set out in a separate policy and acknowledges that to allow or condone bullying may lead to consideration under Child Protection procedures. All incidences of bullying, including cyber-bullying, racist, homophobic and gender related bullying, will be dealt with in accordance with our anti-bullying policy. We recognise that children with special needs and/or disabilities are more susceptible to being bullied. We maintain a log of bullying incidents in school on our Safeguarding software.

11.2 We recognise that there will be occasions when bullying incidents will fall within Child Protection procedures or may be deemed criminal activity and that it may be necessary to report the concerns to Children's Social Care or to the Police.

2 Online safety

12.0A Online safety is a whole-school safeguarding responsibility. The Trust will support pupils, staff and families to understand online risks and ensure that policy, curriculum, filtering, monitoring, reporting and response arrangements are effective.

12.0B Schools will address content, contact, conduct and commerce risks, including cybercrime, radicalisation, online harassment, exploitation, making or sharing nudes or semi-nudes, deepfakes including AI-generated nudes or semi-nudes, misogyny, image-based sexual abuse, online financial exploitation, misinformation and disinformation.

12.0C The Trust and its schools will have arrangements for the safe and effective use of generative AI. New AI tools must undergo a proportionate risk assessment before use. Staff must not enter personal, safeguarding or other confidential pupil data into unapproved tools, and AI outputs must not be relied upon without professional review.

12.0D Filtering and monitoring arrangements will be reviewed for effectiveness at least annually. Checks must confirm that filtering operates appropriately on all internet-connected devices in all relevant locations. The school will retain a record of checks, testing, actions and follow-up.

12.0E Information-security arrangements will protect the confidentiality, integrity and availability of safeguarding information through access management, secure passwords and multi-factor authentication where used, device security, incident reporting, data-breach response and proportionate staff training.

12.0F The school's **Online Safety Lead** is **Mrs Catherine O'Donnell**. The school uses filtering, monitoring and IT support services provided by **Bordesley IT**. The use of artificial intelligence (AI) within the school must be appropriate, lawful and compliant with the MAT AI Policy, safeguarding, confidentiality and data protection requirements.

Filtering and monitoring arrangements are reviewed at least half-termly by school leaders as part of the school's safeguarding and online safety monitoring processes. Any concerns relating to online safety, inappropriate content, filtering or monitoring systems must be reported immediately to the Online Safety Lead and the Headteacher.

Technical support and advice regarding filtering, monitoring and cyber security are provided by Bordesley IT. Any actual or suspected cyber security incident, data breach, loss of personal information or compromise of school systems must be reported immediately to the Headteacher and managed in accordance with the school's data protection procedures. Where required, incidents will be referred to the school's Data Protection Officer and other relevant agencies.

12.1 It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school approach to online safety empowers a school to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. All staff are aware that abuse can take place solely online.

12.2 The breadth of issues classified within online safety is considerable and ever evolving, but can be

categorised into four areas of risk:

12.2.1 **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, ~~fake news,~~ racism, misogyny, self-harm, suicide, anti-Semitism,

radicalisation, extremism, misinformation including the use of generative AI to stimulate this, disinformation (including fake news) and conspiracy theories and extreme sexual or physical violence.

12.2.2 **contact:** being subjected to harmful online interaction with other users; for example: child on child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

12.2.3 **conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including those generated using AI and online bullying

12.2.4 **commerce:** - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group APWG | Unifying The Global Response To Cybercrime

12.3 Governing bodies and Trustees will ensure online safety is a running and interrelated theme whilst devising and implementing their whole school approach to safeguarding and related policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead (and deputies) and any parental engagement.

12.4 The DSL understands the unique risks associated with online safety and has the relevant knowledge and up to date capability required to keep children safe whilst they are online at school and at home.

12.5 The DSL is able to recognise the additional risks that children with special educational needs and disabilities face online, for example from online bullying, grooming and radicalisation, and has the capability to support SEND children to stay safe online.

12.6 All members of staff are trained in and receive regular updates in online safety and recognising and reporting concerns.

12.7 At Shires MAT we have a clear policy in each Academy on the use of mobile and smart technology including wearable technology such as meta glasses. We understand that many children have unlimited and unrestricted access to the internet via mobile phone networks, including 4G and 5G. This access can allow children, including while at school, to sexually harass, bully, coerce and control others; make or share nudes or semi-nudes consensually or non-consensually, including via large chat groups and AI-generated/deepfake content; and view or share pornography and other harmful content. Each academy must publish, teach and enforce its mobile phone and smart-technology arrangements as part of the whole-school approach to safeguarding, behaviour, online safety and child-on-child abuse.

12.8 In line with Keeping Children Safe in Education, we proactively monitor pupils' internet use. This requires safeguarding teams across the Trust to access websites that pupils are attempting to access and therefore unrestricted internet access is needed for certain staff. Internal logs of all staff internet access are still maintained

12.9 Children and young people may expose themselves to danger, whether knowingly or unknowingly, when using the internet and other technologies.

12.10 Additionally, some young people may find themselves involved in activities which are inappropriate or illegal. Children with advanced computing or coding skills may be vulnerable to becoming involved in cybercrime, sometimes without understanding

Computer Misuse Act offences

such as unauthorised access, unauthorised acts with intent to impair operation of a computer, or making/supplying articles for use in such offences. Staff must treat concerns as safeguarding matters and seek DSL advice.

Parental engagement: schools will signpost parents and carers to up-to-date online-safety information, including guidance on age-appropriate supervision, screen time, harmful content, privacy, reporting routes and the safe use of mobile phones and AI-enabled technology.

our pupils, teaching them the appropriate

12.11 behaviours and critical thinking skills to enable them to remain both safe and legal when using the internet and related technologies. We will ensure that filters are in place to prevent access to unsuitable sites and we will monitor the use of the Academy network and internet to ensure that any pupil or staff member attempting to access inappropriate, abusive or harmful material is appropriately advised and/or supported. We regularly review the effectiveness of these filtering systems with the support of, our technical IT support partners. We ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. We also consider the age range of their children, the number of children, how often they access the IT system and the proportionality of costs verses safeguarding risks. All of the above meet the filtering and monitoring standards in KCSIE.

We therefore recognise our responsibility to educate

12.12

Where an AI tool is used by the school/college. Filtering and monitoring expectations apply to AI use. Where nudes or semi-nudes, including AI-generated images, have been made or shared, staff will follow current UKCIS advice on sharing nudes and semi-nudes and the school's safeguarding procedures.

13 Photography and use of images (including hand held devices)

13.0A Each school will maintain a clear mobile-phone and smart-technology including (wearable technology) policy covering pupils, staff and visitors, storage, use, photography, recording, emergencies, breaches and reasonable adjustments.

13.0B Pupil mobile phones are not generally permitted in school. The only exception is for pupils who have parental permission to walk home independently under the school's Walking Home Agreement. In these circumstances, pupils may bring a mobile phone to school. All mobile phones must be handed to the School Office immediately on arrival and will be stored securely during the school day. Phones must not be accessed by pupils during school hours and will be returned to pupils at the end of the school day before they leave the premises. Any misuse of a mobile phone will be dealt with in accordance with the school's behaviour and safeguarding procedures.
Staff are expected to use mobile phones responsibly and in accordance with the school's safeguarding, confidentiality and data protection requirements. Personal devices must not be used to photograph or record pupils.

13.1 The welfare and protection of our children is paramount and consideration should always be given to whether the use of photography will place our children at risk. Images may be used to harm children, for example as a preliminary to 'grooming' or by displaying them inappropriately on the internet, particularly social networking sites.

13.2 For this reason, consent is always sought when photographing children using any means and including iPads, smart phones or cameras, and additional consideration given to photographing vulnerable children, particularly Looked After Children or those known to be fleeing domestic violence. Consent must be sought from those with parental responsibility (this may include the Local Authority in the case of Looked After Children).

13.3 Parents, carers and other spectators are requested not to take personal photographs or videos at school events, including school plays, music concerts, sports days and sports matches. We will make available an opportunity for them to take a personal image of their individual child at such events for their own personal memories. Where appropriate, staff will issue a verbal reminder of this at the start of the event. The school may take photographs or videos using school equipment, which can then be made available to parents/carers, having ensured that consent has been sought before taking and using any images. This is to safeguard all the children in our schools and ensure that we operate within the guidance that seeks to protect children in England, particularly around potential risks associated with sharing images of children online.

13.4 Many pupils own or have access to hand held devices and parents are encouraged to consider measures to keep their children safe when using the internet and social media at home and in the community.

14 Restrictive interventions and reasonable force (schools only)

Staff may use reasonable force only where lawful and necessary, using no more force than is necessary for the least amount of time. The decision is based on professional judgement and individual circumstances. The school will not adopt a “no contact” policy that prevents staff from safeguarding pupils. For pupils with SEND, mental health needs or medical conditions, staff will consider additional vulnerability, reasonable adjustments and proactive individual support plans in line with DfE restrictive-intervention guidance.

14.1 Our policy on the safer handling of pupils is set out in Annex 14 and acknowledges that staff must only ever use physical intervention as a last resort, and that at all times it must be the minimum force necessary to prevent injury or damage to property.

14.2 We acknowledge that when applying reasonable force in response to risks presented by incidents involving children with special educational needs or disabilities or with medical conditions, it is important to recognise their additional vulnerability and make every effort to reduce the occurrence of challenging behaviour and the need to use reasonable force.

14.3 We understand that physical intervention of a nature that causes injury or distress to a child may be considered under management of allegations or disciplinary procedures.

14.4 Staff who are likely to need to use physical intervention will be appropriately trained in Safer Handling methods, or equivalent. Each Academy maintains a list of staff who have completed this training.

14.5 All incidences of physical intervention will be recorded in accordance with Safer Handling recommended procedures.

14.6 We recognise that touch is appropriate in the context of working with children and all staff have been given 'safer working practice' guidance to ensure they are clear about their professional boundaries. We recognise that the adoption of a ‘no contact’ policy could leave staff unable to fully support and protect our pupils.

14.7 Any member of staff may use reasonable force only as a last resort, after de-escalation and less restrictive alternatives have been considered or used where safe to do so where it is necessary and proportionate to the circumstances to prevent a greater harm or greater perceived harm from occurring.

15 Supporting Children

15.0A Safeguarding education will be delivered through an age-appropriate, evidence-informed curriculum, including Relationships Education, RSE and Health Education, PSHE, online safety and behaviour culture. Schools will challenge racism, misogyny, misandry, homophobia, biphobia, transphobia, discriminatory language, derogatory behaviour and other forms of physical violence and conflict. Schools should use high-quality resources, including PSHE Association quality-assured resources where appropriate.

15.0B The school's **PSHE and RSE Curriculum Lead** is **Mrs Sian Rajjayabun**. Personal, Social, Health and Economic (PSHE) Education and Relationships and Sex Education (RSE) are delivered in accordance with the school's **PSHE Policy** and form an important part of the school's approach to safeguarding and promoting pupils' wellbeing.
Through the curriculum, pupils are taught about healthy relationships, personal safety, online safety, mental health and wellbeing, consent, respect, diversity, protective behaviours and how to seek help when they have concerns. Safeguarding themes are embedded throughout the curriculum in an age-appropriate manner.
Pupils are encouraged to share any worries, concerns or safeguarding issues with a trusted adult. Concerns raised through lessons, pastoral support, pupil surveys, school council meetings, worship, circle time or other pupil voice activities will be responded to appropriately and, where necessary, referred to the Designated Safeguarding Lead.
The school actively seeks the views of pupils through pupil voice activities, including the School Council and other opportunities for consultation, to ensure that pupils feel safe, listened to and supported.

15.1 We recognise that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame.

15.2 We understand that some children may need a social worker due to abuse, neglect and complex family circumstances and that their experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged from barriers to attendance, learning, behaviour and mental health. The DSL will use information shared by the Local Authority to make decisions in the best interests of the child's safety, welfare and educational outcomes and to inform decisions about safeguarding and promoting welfare

15.3 We acknowledge that the Academy may be the only stable, secure and predictable element in the lives of children who have been abused or who are at risk of harm.

15.4 We are aware that research shows that at the Academy their behaviour may be challenging and defiant or they may be withdrawn.

15.5 The Academy will endeavour to support all children by:

15.5.1 encouraging self-esteem and self-assertiveness through the curriculum, as well as promoting respectful relationships, challenging bullying and humiliating behaviour;

15.5.2 promoting a positive, supportive and secure environment giving pupils a sense of being valued;

15.5.3 a consistently applied behaviour and discipline policy, available on our website, which is aimed at supporting vulnerable pupils. The Academy will ensure that the pupil knows that some behaviour is unacceptable but that they are valued and not to be blamed for any abuse which has occurred;

15.5.4 liaising with other agencies that support the pupil such as Children's Social Care Services, Child and Adult Mental Health Service (CAMHS), Educational Psychology Service and those agencies involved in the safeguarding of children;

15.5.5 the use of Early Help Services, or local equivalent services, when appropriate;

15.5.6 notifying Children's Social Care immediately when there is a significant concern;

15.5.7 providing continuing support to a child about whom there have been concerns who leaves the Academy by ensuring that appropriate information is forwarded under confidential cover to the child's new setting

16 Supporting and Supervision of Staff

16.1 We recognise that staff working in the Academy who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.

16.2 We will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support such as counselling or regular supervision, as appropriate.

16.3 We will enable termly supervision for the DSL and their safeguarding teams within the Trust Safeguarding team, in order to promote best practice and support the mental health and wellbeing of staff.

16.4 In order to reduce the risk of allegations being made against staff, and ensure that staff are competent, confident and safe to work with children, they will be made aware of safer working practice guidance and will be given opportunities in training to develop their understanding of what constitutes safe and unsafe behaviour.

17 Safer Recruitment and Selection of Staff

17.0A The Trust's safer-recruitment arrangements apply to employees, agency workers, contractors, volunteers, governors, trainee teachers, visitors and other adults working in or on behalf of a school. Recruitment material will describe safeguarding responsibilities and make clear that safeguarding checks will be undertaken.

17.0B An online search may be undertaken as part of shortlisted-candidate due diligence. It will be applied consistently, proportionately and lawfully, recorded, and used only to identify incidents or issues relevant to suitability to work with children.

17.0C All offers are conditional on satisfactory completion of required pre-appointment checks. Schools will use the DfE Check a teacher's record service, current DBS guidance and the DBS Update Service rules as appropriate; individuals can join the DBS Update Service when applying for a DBS check or within 30 calendar days of the certificate issue date. The single central record will meet statutory requirements and use the current DfE template/checklist as a quality-assurance benchmark; the Trust will retain evidence of regular audit.

17.0D Visitor categories will be risk assessed and recorded. Schools will distinguish between supervised visitors, contractors, professionals, regular visitors, volunteers and those undertaking regulated activity. External organisations, visiting speakers and individuals coming onto premises must be assessed for education value, age appropriateness and whether relevant checks are required. Work-experience arrangements must include clear supervision, risk assessment and safeguarding expectations. Homestay/host-family arrangements for exchange visits or sports tours must follow the school's written risk-assessed procedure.

17.0E The **Trust HR Lead** is **Claire Casey**. Responsibility for HR support for primary schools sits with **Susanna Cookes**. During her maternity leave, this responsibility is being undertaken by **Micala Evans**.
The school's **Safer Recruitment Lead** is the **Headteacher**, who is responsible for ensuring that recruitment and selection procedures are conducted in accordance with statutory guidance and safer recruitment requirements.
The school maintains a **Single Central Record (SCR)** of pre-employment and safeguarding checks. The SCR is updated as required and formally audited at least **termly** to ensure compliance with statutory requirements.
All visitors are required to report to the School Office on arrival, sign in using the school's visitor procedures and wear appropriate identification whilst on site. Visitors are provided with safeguarding information and supervised as appropriate.
Responsibility for coordinating any work experience placements rests with the **Headteacher**.
The school does not currently operate homestay arrangements. Should any homestay arrangement be proposed in the future, appropriate safeguarding procedures and risk assessments will be implemented in line with relevant statutory guidance.

17.1 The Academy has a written recruitment and selection policy statement and procedures linking explicitly to this policy. The following statement is included in all job advertisements, publicity material, recruitment websites, and candidate information packs

Shires Multi Academy Trust is committed to safeguarding and promoting the welfare of children and expects all staff and volunteers to share this commitment. All offers of employment are subject to an Enhanced DBS check, and where applicable, a prohibition from teaching check will be completed for all applicants. The Trust is committed to the promotion of equal opportunities and diversity.

17.2 References are requested and scrutinised for all candidates prior to interview and any discrepancies or concerns are raised and discussed during interview, including for any volunteers and internal candidates. References are always requested directly from the referee and verified as being from a senior person with appropriate authority and electronic references are checked to ensure they originate from a legitimate source. Where specific questions have not been answered satisfactorily or insufficient evidence is provided, the

referee will be contacted directly for further clarification. Where references are not forthcoming, despite reminders, the candidate will be asked to provide an alternative referee.

17.3 All staff working within our Academy who are in regulated activity, or who otherwise require checks under KCSIE, have been checked as to their suitability, including verification of identity, qualifications, right to work in the UK, prohibition and/or section 128 checks where applicable, and an enhanced DBS check with children's barred list information where the role is regulated activity. The legal definition of regulated activity reflects the Safeguarding Vulnerable Groups Act 2006 as amended, including changes made by the Crime and Policing Act 2026.

17.4 All teachers working within our Academy have been checked using the Teacher Services website to ensure they have been awarded QTS, they have completed their teacher induction and that there are no prohibitions, sanctions or restrictions in place that might prevent them from taking part in certain activities or working in specific positions, e.g. management posts.

Criminal history and suitability to work with children information will only be requested from applicants who have been shortlisted.

As part of the shortlisting process schools should consider conducting an online search as part of their due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school or college might want to explore with the applicant at interview

17.5 The Academy seeks written assurance from supply and third-party agencies, alternative providers, initial teacher training providers and contractors that they have undertaken all appropriate checks on any of their staff, trainees, contractors or volunteers who work with or have regular contact with our pupils. Schools retain shared safeguarding responsibility with third-party organisations and will act immediately where concerns arise. All contracted staff also receive a copy of this safeguarding policy and the Staff Code of Conduct.

17.6 Our governors and trustees are subject to an enhanced DBS check without barred list check and have been checked to ensure they are not disqualified from holding office under a section 128 direction.

17.7 The Academy maintains a single central record of recruitment checks for audit purposes and use StaffSafe to ensure this is secure and monitored regularly

17.8 Any member of staff working in regulated activity prior to receipt of a satisfactory DBS check will not be left unsupervised and will be subject to a risk assessment.

17.9 Volunteers must be assessed under the published KCSIE 2026 regulated activity rules. The Crime and Policing Act 2026 removed the former supervision exemption. Any person volunteering in a school or college in a role involving teaching, training, instructing, caring for or supervising children frequently, on more than three days in a 30-day period, or overnight, is in regulated activity and must have an enhanced DBS check with children's barred list information. Existing volunteers who become regulated activity from 1 September 2026 must have their children's barred list status checked.

17.9B Where an individual meets the regulated-activity period condition across multiple settings, the school will work with the other settings to decide who should apply for the enhanced DBS check with children's barred list information. The Trust will also consider its Public Sector Equality Duty when applying safer-recruitment and safeguarding procedures.

17.9A Volunteers who are not in regulated activity must not be left unsupervised where no checks have been obtained. The school will complete a written risk assessment considering the nature of work with children,

what the school knows about the volunteer, other employment or volunteering, referees, whether an enhanced DBS check without barred list information or a basic DBS check is appropriate, and where the assessment will be stored.

17.10 Staff and volunteers who provide early years or later years childcare and any managers of such childcare are covered by the disqualification regulations of the Childcare Act 2006 and are required to declare such relevant information – see statutory guidance: Disqualification under the Childcare Act 2006.

18 Allegations against staff

18.0A All safeguarding concerns or allegations about any adult working in or on behalf of a school, including employees, governors, supply teachers, trainee teachers, volunteers, contractors, agency workers and organisations using premises, must be reported immediately to the headteacher/principal or a named case manager where the concern relates to the headteacher/principal.

18.0B The case manager must consider promptly whether the harm threshold may be met and whether a referral to the LADO is appropriate. The decision and rationale must be recorded, and advice sought where there is doubt. Where a concern or allegation relates to a trainee teacher, the school's procedures apply in full; the teacher-training provider must be informed and is expected to follow equivalent procedures to those applied to supply agencies.

18.0C Low-level concerns do not mean insignificant concerns. The Trust will maintain an open and transparent culture in which concerns are shared responsibly, recorded, reviewed for patterns and addressed in line with the staff code of conduct.

18.0D The school's **Case Manager** for allegations against staff and volunteers is the **Headteacher**.
Allegations against the Headteacher will be managed by the **Chair of Governors**, who will liaise with the Local Authority Designated Officer (LADO) as required.
The school follows Worcestershire's procedures for managing allegations against adults working with children. Concerns that may meet the harm threshold will be referred to the **Local Authority Designated Officer (LADO)** without delay.
Worcestershire LADO Contact Details: Telephone: **01905 846221**
Email: **LADO@worcschildrenfirst.org.uk**
Low-level concerns will be managed in accordance with the school's safeguarding procedures and statutory guidance. **Low-level concerns are recorded and managed securely using CPOMS.**
Records are reviewed by the Headteacher and maintained in accordance with safeguarding and data protection requirements.
Safeguarding training for all staff is provided through **The National College**, supplemented by regular safeguarding updates and briefings delivered by the **Designated Safeguarding Lead**. Specialist training for the **DSL and Deputy DSLs** is provided through **Brightcore** and other approved safeguarding training providers where appropriate.

18.1 We acknowledge that a pupil may make an allegation against a member of staff. The procedure for dealing with such an allegation is set out in our Abuse Allegations Procedures.

18.2 If such an allegation is made but is considered a low level concern as in KCSIE, it will be kept as a digital file in the Headteacher's Staff Safe account. A low-level concern means the allegations against that staff member do not meet the harms threshold and this person does not pose an immediate risk towards the students.
The adult in question may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- is otherwise not considered serious enough to consider a referral to the LADO

- These low level concerns will be monitored by the Headteacher (or Chair of governors if against the Headteacher) and taken to the LADO if reaching the Threshold as stated in 18.3. Please also see Trust policy on low level concerns.

18.3 If such an allegation is made, which meets the criteria as identified in Part 4 of Keeping Children Safe in Education, the member of staff receiving the allegation will immediately inform the Headteacher, unless the allegation concerns the Headteacher, in which case the Chair of Governors will be informed immediately.

18.4 The Headteacher (or Chair of Governors) on all such occasions will discuss the content of the allegation with the Local Authority's Senior Adviser for Safeguarding Children in Education or the LADO, prior to undertaking any investigation.

18.4 The Academy will follow the DfE and LA procedures for managing allegations against staff.

18.5 The case manager will be guided by the Senior Adviser and/or LADO in all matters relating to the case, including suspension, sharing of information and any follow up investigation.

19 Abuse of Position of Trust

19.1 We recognise that as adults working in the Academy, we are in a relationship of trust with the pupils in our care and acknowledge that it could be considered a criminal offence to abuse that trust.

19.2 We acknowledge that the principle of equality embedded in the legislation of the Sexual Offenders Act 2003 applies irrespective of sexual orientation: neither homosexual nor heterosexual relationships are acceptable within a position of trust

19.3 We acknowledge that where a teacher over the age of 18 engages in activity with a pupil under the age of 18, then this constitutes a specific breach of trust offence.

19.4 We recognise that the legislation is intended to protect young people in education who are over the age of consent but under 18 years of age.

20 Whistleblowing

20.1 We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

20.2 All staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues using the Academy's confidential whistleblowing policy.

20.3 Whistleblowing concerns about the Headteacher/Headteacher should be raised with the Chair of Governors.

20.4 Staff will be made aware that if they feel unable to raise a Child Protection failure internally, they can contact the NSPCC Whistleblowing advice helpline on 0800 028 0285 or email help@nspcc.org.uk

21 Complaints or Concerns expressed by Pupils, Parents, Staff, Supply Staff Trainee Teachers or Volunteers

21.1 We recognise that listening to children is an important and essential part of safeguarding them against abuse and neglect. To this end, any expression of dissatisfaction or disquiet in relation to an individual child will be listened to and acted upon in order to safeguard his/her welfare.

21.2 We will also seek to ensure that the child or adult who makes a complaint is informed not only about the action the Academy will take but also the length of time that will be required to resolve the complaint. The Academy will also endeavor to keep the child or adult regularly informed as to the progress of his/her complaint. The Academy's complaints procedures are readily available.

22 Health & Safety

22.1 Our health & safety policy, set out in a separate document, reflects the consideration we give to the safeguarding of our children both within the school environment and when away from the school, for example when undertaking school trips and visits.

22.2 Risk assessments are undertaken and reviewed regularly, in respect of site security, risk of children being drawn into terrorism or exposed to extremist behaviour, risk to and from children displaying harmful behaviour.

23 Safe Environment

23.0A The Trust recognises sport as a safeguarding context. Governing bodies and proprietors will ensure that safeguarding arrangements cover curriculum sport, clubs, fixtures, coaching, volunteers, off-site activity, changing rooms, transport, photographs/images, physical contact, medical needs, supervision and conduct by staff, pupils, visitors and external coaches.

23.0B Where school premises are used by external organisations or individuals for activities involving children, written arrangements must set out safeguarding responsibilities, safer-recruitment/DBS assurance as appropriate, reporting routes, allegations management, supervision, insurance, risk assessment, use of facilities, age-appropriate educational value where relevant, record keeping and notification of concerns to the LADO or children's social care where relevant.

Safeguarding requirements for sport and school/college premises

Sport: where a sport is separated by sex for safety or fairness in accordance with the Equality Act 2010, participation will be organised by biological sex. Where there are no safety concerns and a child requests an alternative arrangement, the school/college will consider the request in the child's best interests, the interests of other children and the need for safe and fair participation.

Toilets: schools must not allow children to use toilets designated for the opposite biological sex. Separate toilets will be provided for boys and girls aged eight and over unless each toilet is in an individual room lockable from the inside for one user. Alternative individual facilities may be considered without compromising single-sex provision or anyone's safety, comfort, privacy or dignity. Arrangements will be recorded, communicated appropriately and reviewed regularly.

Changing rooms and showers: a child aged 11 or over at the start of the school year must not undress in front of a child of the opposite biological sex and must not use changing or shower facilities designated for the opposite sex. Alternative private arrangements or access at a different time may be considered, without compromising single-sex provision or anyone's safety, comfort, privacy or dignity. Arrangements will be recorded and reviewed.

Boarding/residential accommodation and trips (where applicable): children will not share overnight accommodation designated for or shared with children of the opposite biological sex. Alternative arrangements will be sought where necessary without compromising any child's safety, comfort, privacy or dignity.

23.0C The Headteacher is responsible for overseeing safeguarding arrangements relating to sport, lettings and external providers operating on the school site.
External providers, including wraparound care providers, sports coaches and other organisations working with children on school premises, are required to have appropriate safeguarding policies, safer recruitment procedures, DBS arrangements, insurance and designated safeguarding arrangements in place.
The school currently works with external providers including **Funzone** (wraparound care) and **AU Sports** (sports provision). These organisations are expected to operate in accordance with their own safeguarding procedures whilst working cooperatively with the school's safeguarding arrangements.
Safeguarding concerns relating to Feckenham CE Primary School pupils must be shared promptly with the Designated Safeguarding Lead where appropriate.
All staff, volunteers, coaches and external providers are expected to adhere to the school's safeguarding expectations and code of conduct whilst on site.
Any safeguarding concern relating to an external provider, volunteer, coach or organisation using the school site must be reported immediately to the Designated Safeguarding Lead. Allegations that meet the threshold will be referred to the Local Authority Designated Officer (LADO) in accordance with Worcestershire procedures.

23.1 The Academy undertakes appropriate risk assessments and checks in respect of all equipment and of the building and grounds in line with local and national guidance and regulations concerning health and safety.

23.2 The Academy has adequate security arrangements in place in respect of the use of its grounds and buildings by visitors both in and out of school hours

23.3 Visitors to the Academy, for example visiting speakers, theatre groups or curriculum specialists, will be appropriately checked and vetted, to ensure they are not linked to extremist groups or promoting extremist or other harmful material. See Annex 17 for the Academy's checking procedure.

24 Challenge and Escalation

24.1 We recognise that professional disagreements may arise between any agencies and resolving problems is an integral part of co-operation and joint working to safeguard children.

24.2 As part of our responsibility for safeguarding children, we acknowledge that we must be prepared to challenge each other if we feel that responses to concerns, assessments or the way in which plans are implemented are not safeguarding the child and promoting their welfare.

24.3 We are aware of the local safeguarding partners escalation procedures for raising concerns in respect of poor practice and recognise our responsibility to utilise these as and when necessary, in the interests of safeguarding and promoting the welfare of children.

25 Monitoring and Evaluation

25.1 Our safeguarding children policy and procedures will be monitored and evaluated by:

- completion of the annual safeguarding audit;
- every three years each academy will be scrutinised by an external audit by Brightcore consultancy;
- annual scrutiny of our Trust Safeguarding policies by Brightcore consultancy;
- completion of the annual safeguarding report;
- pupil surveys and questionnaires;
- discussions with children and staff;

- scrutiny of data and risk assessments;
- scrutiny of the Academy's single central record of recruitment checks;
- scrutiny of Governing Body minutes;
- monitoring of logs of bullying/racist/behaviour incidents and Safer Handling records;
- supervision of staff involved in Child Protection;
- case file audits undertaken by the DSL and Trust Safeguarding Leads;
- annual action plans implemented based up monitoring and evaluations.

26 Other Relevant Policies

26.0A Related policies and procedures must include, where relevant: mobile phones and smart technology; generative AI and data protection; filtering and monitoring; information security and cyber security; alternative provision commissioning; medical conditions; young carers; safer recruitment and the SCR; low-level concerns; allegations; child-on-child abuse including harassment and violence; work experience; homestays; lettings and external providers; sport safeguarding; attendance and children missing education; temporary accommodation notifications; equality, anti-bullying and behaviour.

26.1 The Governing Body's statutory responsibility for safeguarding the welfare of children goes beyond basic Child Protection procedures.

26.2 The duty is now to ensure that safeguarding permeates all activity and functions. This policy therefore complements and supports a range of other policies, including:

26.2.1
- Allegations Abuse Procedures;
- Anti-Bullying Policy (including cyber-bullying and racist incidents);
- Behaviour and Discipline Policy;
- Child on Child Abuse Policy
- Complaints Procedure;
- Equality and Diversity Policy;
- EYFS Policy
- Online safety and Acceptable Internet Use;
- First aid and the Administration of Medicines;
- Health and Safety Policy;
- Off-site Educational Visits Policy;
- Relationships and Sex Education Policy;
- Special Educational Needs Policy;
- Staff Code of Conduct;
- Supporting pupils with Medical Conditions Policy;
- Whistleblowing Policy (Confidential Reporting);
- Recruitment and Selection Policy.

The above list is not exhaustive, but when undertaking development or planning of any kind the Academy will need to consider safeguarding matters.

Annex 1 Recognition and Identification of Abuse

Annex 1 update: Staff must recognise that safeguarding concerns can overlap and that repeated low-level concerns may form a pattern of cumulative harm. Emotional abuse can include persistent verbal abuse such as criticism, belittling or name-calling. Domestic abuse includes physical, sexual and emotional abuse, stalking and financial exploitation, and can affect children who see, hear or experience its effects.

Definitions taken from Working Together to Safeguard Children 2026, Appendix A

What is abuse?

Abuse, exploitation and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by others. Abuse can take place wholly online or technology may be used to facilitate offline abuse. They may be abused by an adult or adults, or another child or children.

Indicators of Abuse

Caution should be used when referring to lists of signs and symptoms of abuse. Although the signs and symptoms listed below may be indicative of abuse there may be alternative explanations. In assessing the circumstances of any child any of these indicators should be viewed within the overall context of the child's individual situation including any disability.

EMOTIONAL ABUSE

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

Emotional abuse is difficult to:

- define;
- identify/recognise;
- prove.

Emotional abuse is chronic and cumulative and has a long-term impact. Indicators may include:

- physical, mental and emotional development lags;
- sudden speech disorders;
- continual self-depreciation ('I'm stupid, ugly, worthless, etc.');
- overreaction to mistakes;
- extreme fear of any new situation;
- inappropriate response to pain ('I deserve this');
- unusual physical behaviour (rocking, hair twisting, self-mutilation) - consider within the context of any form of disability such as autism;

- extremes of passivity or aggression;
- children suffering from emotional abuse may be withdrawn and emotionally flat. One reaction is for the child to seek attention constantly or to be over-familiar. Lack of self-esteem and developmental delay are again likely to be present;
- babies – feeding difficulties, crying, poor sleep patterns, delayed development, irritable, non-cuddly, apathetic, non-demanding;
- toddler/pre-school – head banging, rocking, bad temper, 'violent', clingy. From overactive to apathetic, noisy to quiet. Developmental delay – especially language and social skills;
- school age – wetting and soiling, relationship difficulties, poor performance at school, non-attendance, antisocial behaviour. Feels worthless, unloved, inadequate, frightened, isolated, corrupted and terrorised;
- adolescent – depression, self-harm, substance abuse, eating disorder, poor self-esteem, oppositional, aggressive and delinquent behaviour;
- child may be underweight and/or stunted;
- child may fail to achieve milestones, fail to thrive, experience academic failure or under achievement;
- also consider a child's difficulties in expressing their emotions and what they are experiencing and whether this has been impacted on by factors such as age, language barriers or disability.

NEGLECT

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

There are occasions when nearly all parents find it difficult to cope with the many demands of caring for children. But this does not mean that their children are being neglected. Neglect involves ongoing failure to meet a child's needs.

Neglect can often fit into six forms which are:

- medical – the withholding of medical care including health and dental;
- emotional – lack of emotional warmth, touch and nurture;
- nutritional – either through lack of access to a proper diet which can affect in their development;
- educational – failing to ensure regular school attendance that prevents the child reaching their full potential academically;
- physical – failure to meet the child's physical needs;
- lack of supervision and guidance – meaning the child is in dangerous situations without the ability to risk assess the danger.[1]

With regard to the child, some of the regular concerns are:

- the child's development in all areas including educational attainment;
- cleanliness;
- health;
- children left at home alone and accidents related to this;
-

Common Concerns

[2] Source: Horwath, J (2007): Child neglect: identification and assessment: Palgrave Macmillan

- taking on unreasonable care for others;
- young carers.

Neglect can often be an indicator of further maltreatment and is often identified as an issue in serious case reviews as being present in the lead up to the death of the child or young person. It is important to recognise that the most frequent issues and concerns regarding the family in relation to neglect relate to parental capability. This can be a consequence of:

- poor health, including mental health or mental illness;
- disability, including learning difficulties;
- substance misuse and addiction;
- domestic violence.

School staff need to consider both acts of *commission* (where a parent/carer deliberately neglects the child) and acts of *omission* (where a parent's failure to act is causing the neglect). This is a key consideration with regard to school attendance where parents are not ensuring their child attend school regularly.

Many of the signs of neglect are visible. However school staff may not instinctively know how to recognise signs of neglect or know how to respond effectively when they suspect a pupil is being neglected. Children spend considerable time in school so staff have opportunities to identify patterns over time and recognise and respond to concerns about their safety and welfare. All concerns should be recorded and reflected upon, not simply placed in a file.

Here are some signs of possible neglect:

Physical signs:

- constant hunger;
- poor personal hygiene;
- constant tiredness;
- emaciation;
- untreated medical problems;
- the child seems underweight and is very small for their age;
- the child is poorly clothed, with inadequate protection from the weather;
- neglect can lead to failure to thrive, manifest by a fall away from initial centile lines in weight, height and head circumference. Repeated growth measurements are crucially important;
- signs of malnutrition include wasted muscles and poor condition of skin and hair. It is important not to miss an organic cause of failure to thrive; if this is suspected, further investigations will be required;
- infants and children with neglect often show rapid growth catch-up and improved emotional response in a hospital environment;
- failure to thrive through lack of understanding of dietary needs of a child or inability to provide an appropriate diet; or may present with obesity through inadequate attention to the child's diet;

- being too hot or too cold – red, swollen and cold hands and feet or they may be dressed in inappropriate clothing;
- consequences arising from situations of danger – accidents, assaults, poisoning;
- unusually severe but preventable physical conditions owing to lack of awareness of preventative health care or failure to treat minor conditions;
- health problems associated with lack of basic facilities such as heating;
- neglect can also include failure to care for the individual needs of the child including any additional support the child may need as a result of any disability.

Behavioural signs:

- no social relationships;
- compulsive scavenging;
- destructive tendencies;
- if they are often absent from school for no apparent reason;
- if they are regularly left alone, or in charge of younger brothers or sisters;
- lack of stimulation can result in developmental delay, for example, speech delay, and this may be picked up opportunistically or at formal development checks;
- craving attention or ambivalent towards adults, or may be very withdrawn;
- delayed development and failing at school (poor stimulation and opportunity to learn);
- difficult or challenging behaviour.

PHYSICAL ABUSE

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

When dealing with concerns regarding physical abuse, refer any suspected non-accidental injury to the DSL without delay so that they are able to seek appropriate guidance from the police and/or Children's Social Care in order to safeguard the child.

Staff must be alert to:

- unexplained recurrent injuries or burns; improbable excuses or refusal to explain injuries;
- injuries that are not consistent with the story: too many, too severe, wrong place or pattern, child too young for the activity described.

Physical signs:

- bald patches;
- bruises, black eyes and broken;
- untreated or inadequately treated injuries;
- injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen;
- scalds and burns;
- general appearance and behaviour of the child may include:

- concurrent failure to thrive: measure height, weight and, in the younger child, head circumference;

- frozen watchfulness: impassive facial appearance of the abused child who carefully tracks the examiner with his eyes.

• bruising:

- bruising patterns can suggest gripping (finger marks), slapping or beating with an object;
- bruising on the cheeks, head or around the ear and black eyes can be the result of non-accidental injury.

• other injuries:

- bite marks may be evident from an impression of teeth;
- small circular burns on the skin suggest cigarette burns;
- scalding inflicted by immersion in hot water often affects buttocks or feet and legs symmetrically;
- red lines occur with ligature injuries;
- retinal haemorrhages can occur with head injury and vigorous shaking of the baby;
- tearing of the frenulum of the upper lip can occur with force-feeding. However, any injury of this type must be assessed in the context of the explanation given, the child's developmental stage, a full examination and other relevant investigations as appropriate;
- fractured ribs: rib fractures in a young child are suggestive of non-accidental injury;
- other fractures: spiral fractures of the long bones are suggestive of non-accidental injury.

Behavioural signs:

- wearing clothes to cover injuries, even in hot weather;
- refusal to undress for gym;
- chronic running away;
- fear of medical help or examination;
- self-destructive tendencies;
- fear of physical contact - shrinking back if touched;
- admitting that they are punished, but the punishment is excessive (such as a child being beaten every night to 'make him study');
- fear of suspected abuser being contacted;
- injuries that the child cannot explain or explains unconvincingly;
- become sad, withdrawn or depressed;
- having trouble sleeping;
- behaving aggressively or be disruptive;
- showing fear of certain adults;
- having a lack of confidence and low self-esteem;
- using drugs or alcohol;
- repetitive pattern of attendance: recurrent visits, repeated injuries;
- excessive compliance;
- hyper-vigilance.

SEXUAL ABUSE

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may include non-contact activities, such as involving children in looking at or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually

inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

Sexual abuse is usually perpetrated by people who are known to and trusted by the child – e.g. relatives, family friends, neighbours, and people working with the child in school or through other activities.

Characteristics of child sexual abuse:

- it is usually planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic;
- grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent. This can be done in person or via the internet through chat-rooms and social networking sites;
- grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives. Again, this can be done in person or via the internet through chat-rooms and social networking sites.

In young children behavioural changes may include:

- regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys;
- being overly affectionate - desiring high levels of physical contact and signs of affection such as hugs and kisses;
- lack of trust or fear of someone they know well, such as not wanting to be alone with a babysitter or child minder;
- they may start using sexually explicit behaviour or language, particularly if the behaviour or language is not appropriate for their age;
- starting to wet again, day or night/nightmares.

In older children behavioural changes may include:

- extreme reactions, such as depression, self-mutilation, suicide attempts, running away, overdoses, anorexia;
- personality changes such as becoming insecure or clinging;
- sudden loss of appetite or compulsive eating;
- being isolated or withdrawn;
- inability to concentrate;
- become worried about clothing being removed;
- suddenly drawing sexually explicit pictures;
- trying to be 'ultra-good' or perfect; overreacting to criticism;
- genital discharge or urinary tract infections;
- marked changes in the child's general behaviour. For example, they may become unusually quiet and withdrawn, or unusually aggressive. Or they may start suffering from what may seem to be physical ailments, but which can't be explained medically;
- the child may refuse to attend school or start to have difficulty concentrating so that their schoolwork is affected;
- they may show unexpected fear or distrust of a particular adult or refuse to continue with their usual social activities;
- the child may describe receiving special attention from a particular adult, or refer to a new, "secret" friendship with an adult or young person;

- children who have been sexually abused may demonstrate inappropriate sexualised knowledge and behaviour;
- low self-esteem, depression and self-harm are all associated with sexual abuse.

Physical signs and symptoms for any age child could be:

- medical problems such as chronic itching, pain in the genitals, venereal diseases;
- stomach pains or discomfort walking or sitting;
- sexually transmitted infections;
- any features that suggest interference with the genitalia. These may include bruising, swelling, abrasions or tears;
- soreness, itching or unexplained bleeding from penis, vagina or anus;
- sexual abuse may lead to secondary enuresis or faecal soiling and retention;
- symptoms of a sexually transmitted disease such as vaginal discharge or genital warts, or pregnancy in adolescent girls.

Sexual Abuse by Young People

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children.

Developmental Sexual Activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Inappropriate Sexual Behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child or young person has been exposed.

If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Abusive sexual activity includes any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

Assessment

In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

- **Equality** – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies;

- **Consent** – agreement including all the following:

- understanding that is proposed based on age, maturity, development level, functioning and experience;
- knowledge of society's standards for what is being proposed;
- awareness of potential consequences and alternatives;
- assumption that agreements or disagreements will be respected equally;
- voluntary decision;
- mental competence.

- **Coercion** – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide.

Annex 2 Managing a disclosure – Practical Information

Teachers and other staff in academies are in a unique position to observe children's behaviour over time and often develop close and trusting relationships with pupils. If a child discloses directly to a member of staff, the following procedures will be followed:

- listen carefully to what is said;
- ask only open questions such as:
  'Tell me what happened.'
  'Please explain what you mean when you say …..'
  'Can you describe the person?' or 'Can you describe the place?'
- do not ask questions which may be considered to suggest what might have happened, or who has perpetrated the abuse, e.g. 'Did your Dad hit you?';
- do not force the child to repeat what he/she said in front of another person;
- do not begin an investigation – for example by asking the child to record what happened in writing or taking a photograph of any injuries; and
- report immediately to the DSL and complete a written record as soon after the disclosure as possible and in any case within 24 hours, using the child's words as far as possible. Use body maps to record any observed injuries.

Annex 3 Report a Concern form -

Report a Concern

Name of staff reporting concern

Student name

Incident

Category

Linked children

Body Maps (where on body if applicable is harmed or important to the concern)

Date and time

Reported to which member of staff (DSL)

Signature date and time

To be added to CPOMS. Continue on separate sheet if needed.

Annex 4 Children Missing Education (Unexplainable or persistent absences)

As a member of staff at the academy you are asked to stay vigilant about any child who is or could potentially become missing from education. Children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities, including abuse, neglect, mental health problems, child sexual exploitation, female genital mutilation, etc.

There are many circumstances where a child or young person may be absent or become missing from education, but some children and young people are particularly at risk. These include those who:

a. Are at risk of harm or neglect.
b. Are at risk of forced marriage or FGM.
c. Come from Gypsy, Roma, or Traveller families.
d. Come from the families of service personnel.
e. Go missing or run away from home or care.
f. Are supervised by the youth justice system.
g. Cease to attend a school/college.
h. Come from new migrant families.
i.

i. We will follow our procedures as set out in our Attendance Policy for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, neglect and exploitation, and to help prevent the risks of going missing in future.

This includes informing the local authority if a child leaves the school/college without a new school/college being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff may overhear discussions amongst pupils about planned absence or the whereabouts of other pupils who are absent. The context of the discussion could include:

- going on holiday to an unusual or potentially dangerous destination
- the route that will be taken to reach the destination
- going on holiday and parents are going to call them in sick
- homes being packed up to move
- moving home and not knowing where to
- the whereabouts of a child who is not in school
- why a child is regularly absent from school

You must report any concerns to the appropriate member(s) of staff, who will address the concern through the academy's safeguarding procedures.

- Safeguarding team through CPOMS
- Headteacher/ Deputy Head
- Attendance Welfare Officer

Do not assume that the matter is being addressed or leave it to another person to pass on the information.

Once the information has been received, the relevant staff will start making appropriate enquiries to ensure the pupil(s) are safe and well.

- Telephone calls home
- Text messages
- Emails
- Home visits
- Contacting relatives
- Police safe and well checks

If there is no acceptable conclusion to the investigations, the matter is referred to the appropriate external agencies.

After 10 days of continuous, unauthorised absence the academy has to notify the local authority's children missing education team.

Annex 5 Child Sexual Exploitation (CSE)

Annex 5 update: CSE may be committed or facilitated by an individual, an organised network or a gang. A child may identify with or feel loyalty to the person or group exploiting them. Victims may be criminalised for conduct they were coerced into; staff must retain professional curiosity and respond through safeguarding processes. CSE may amount to modern slavery and DSLs must consider National Referral Mechanism duties.

Child Sexual Exploitation is a form of abuse which involves children (male and female, of different ethnic origins and of different ages) receiving something in exchange for sexual activity.

Child Sexual Exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. (Department for Education, February 2017)

The definition and further guidelines can be found in the DfE document '*Child sexual exploitation - Definition and a guide for practitioners*'

Who is at risk?

Child Sexual Exploitation can happen to any young person from any background. Although the research suggests that the females are more vulnerable to CSE, boys and young men are also victims of this type of abuse.

The characteristics common to all victims of CSE are not those of age, ethnicity or gender, rather their powerlessness and vulnerability. Victims often do not recognise that they are being exploited because they will have been groomed by their abuser(s). As a result, victims do not make informed choices to enter into, or remain involved in, sexually exploitative situations but do so from coercion, enticement, manipulation or fear. Sexual exploitation can happen face to face and it can happen online. It can also occur between young people.

In all its forms, CSE is child abuse and should be treated as a Child Protection issue.

WARNING SIGNS AND VULNERABILITIES CHECKLIST[2]

The evidence available points to several factors that can increase a child's vulnerability to being sexually exploited. The following are typical vulnerabilities in children prior to abuse:

- living in a chaotic or dysfunctional household (including parental substance use, domestic violence, parental mental health issues, parental criminality);
- history of abuse (including familial child sexual abuse, risk of forced marriage, risk of 'honour'-based violence, physical and emotional abuse and neglect);
- recent bereavement or loss;
- gang association either through relatives, peers or intimate relationships (in cases of gang-associated CSE only);
- attending school with young people who are sexually exploited;
- learning disabilities;

[2] The Office of the Children's Commissioner (2012) Interim Report - Inquiry into Child Sexual Exploitation in Group and Gangs.

- unsure about their sexual orientation or unable to disclose sexual orientation to their families;
- friends with young people who are sexually exploited;
- homeless;
- lacking friends from the same age group ;
- living in a gang neighbourhood;
- living in residential care;
- living in hostel, bed and breakfast accommodation or a foyer;
- low self-esteem or self-confidence;
- young carer.

The following signs and behaviour are generally seen in children who are already being sexually exploited:

- missing from home or care;
- physical injuries;
- drug or alcohol misuse;
- involvement in offending;
- older boyfriend/girlfriend
- repeat sexually-transmitted infections, pregnancy and terminations;
- absent from school;
- evidence of sexual bullying and/or vulnerability through the internet and/or social networking sites;
- estranged from their family;
- receipt of gifts from unknown sources;
- recruiting others into exploitative situations;
- poor mental health;
- self-harm;
- thoughts of or attempts at suicide.

Evidence shows that any child displaying several vulnerabilities from the above lists should be considered to be at high risk of sexual exploitation.

All schools should ensure that there is a dedicated lead person with responsibility for implementing local guidance in respect of child sexual exploitation. This would normally be the DSL.

The DSL must ensure they are aware of any guidance on Child Sexual Exploitation on their local safeguarding partners website, as well as follow their local safeguarding partners pathway for dealing with issues of CSE, including completion of any screening tool.

The DSL must ensure that all staff are aware of signs and symptoms of CSE and know that these must be reported and recorded as Child Protection concern

Annex 6 Child Criminal Exploitation and County Lines

Annex 6 update: CCE may be committed or facilitated by an individual, an organised network or a gang. Staff must consider the child's association, loyalty or perceived debt to those exploiting them, and must consider potential modern-slavery indicators and the need for statutory safeguarding and National Referral Mechanism action.

What is County Lines?

County Lines is a very serious issue where criminal gangs set up a drug dealing operation in a place outside their usual operating area. Gangs will move their drug dealing from big cities (e.g. London, Manchester, Liverpool etc.) to smaller towns and rural areas in order to make more money. This can have a really big effect on the community who live there and bring with it serious criminal behaviour.

The UK Government defines county lines as:

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

Child criminal exploitation is increasingly used to describe this type of exploitation where children are involved, and is defined as:

Child Criminal Exploitation is common in county lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology.

Criminal exploitation of children is broader than just county lines and includes, for instance, children forced to work on cannabis farms or to commit theft.

Crimes Associated with County Lines

Drugs

County lines commonly involves the illegal distribution and dealing of seriously dangerous drugs from one city/town to another. The most common drugs involved are heroin and cocaine (crack and powder), but also MDMA, cannabis, amphetamines and spice.

Violence

Gangs sometimes use violence to threaten children and young people when recruiting them. Gangs also violently assault children and young people working for them if they find their drugs or money to be missing. Weapons such as firearms, knives, bats, acid are sometimes used to make violent threats.

Exploitation

Gangs recruit and use children and young people to move drugs and money for them. Children as young as 11 years old are recruited, often using social media. They are exploited and forced to carry

drugs between locations, usually on trains or coaches. They are also forced to sell drugs to local users.

Sexual Exploitation

Young girls are often groomed and forced into relationships with gang members and are made to perform sexual acts.

Signs to look out for

A young person's involvement in CCE or county lines activity often leaves signs. A person might exhibit some of these signs, either as a member or as an associate of a gang dealing drugs.

- Are they always going missing from school or their home or regularly coming home late?
- Are they travelling alone to places far away from home?
- Do they suddenly have lots of money/lots of new clothes/new mobile phones?
- Are they receiving many more calls or texts than usual?
- Are they carrying or selling drugs?
- Are they misusing drugs or alcohol?
- Are they carrying weapons or know people that have access to weapons?
- Are they in a relationship with or hanging out with someone/people that are older and controlling?
- Do they have unexplained injuries?
- Do they seem very reserved or seem like they have something to hide?
- Do they seem scared?
- Have they suffered from changes in emotional wellbeing?
- Are they self-harming?

Terms associated with County Lines

Here are some words/terms that are commonly used when describing county lines activity. someone using these words might be involved in or might know of County Lines activity.

Cuckooing

Cuckooing is when drug gangs take over the home of a vulnerable person through violence and intimidation, using it as their base for selling/manufacturing drugs.

Signs of cuckooing:

- An increase in people coming and going
- An increase in cars or bikes outside
- Litter outside
- Signs of drugs use
- You haven't seen the person who lives there recently or when you have, they have been anxious or distracted.

Going Country

This is the most popular term that describes County Lines activity. It can also mean the act of travelling to another city/town to deliver drugs or money.

Trapping

The act of selling drugs. Trapping can refer to the act of moving drugs from one town to another or the act of selling drugs in one.

Trap House

A building used as a base from where drugs are sold (or sometimes manufactured). These houses usually are occupied by someone (usually adult drug users) but sometimes young people are forced to stay in trap houses.

Trap line

This refers to when someone owns a mobile phone specifically for the purpose of running and selling of drugs.

What to do if you have concerns a young person is involved in County Lines

Follow your normal safeguarding procedures and refer to your school's DSL. The DSL will refer on to Children's Social Care and/or the Police, if the young person is at immediate risk of harm.

Further information is available in the regional guidance:

https://west-midlands.police.uk/your-options/county-lines

Further guidance is available in the Home Office's publication 'County Lines: criminal exploitation of children and vulnerable adults'.

Annex 7

Annex 7 Effects of domestic abuse on children and young people

This policy draws upon legislation laid out in the Domestic Abuse Act, 2021. The impact of domestic abuse on the quality of a child's or young person's life is very significant. Children and young people who live with domestic abuse are at increased risk of behavioural problems, emotional trauma, and mental health difficulties in adult life. The impact of domestic abuse on children as a form of emotional abuse can have many effects.

The impact of domestic abuse on children and young people can be wide-ranging and may include effects in any or all of the following areas:

Physical: Children and young people can be hurt either by trying to intervene and stopping the violence or by being injured themselves by the abuser. They may develop self-harming behaviour, or eating disorders. Their health could be affected, as they may not be being cared for appropriately. They may have suicidal thoughts or try to escape or blank out the abuse by using drugs, alcohol or by running away.

Sexual: There is a high risk that children and young people will be abused themselves where there is domestic abuse. In homes where living in fear is the norm, and situations are not discussed, an atmosphere of secrecy develops and this creates a climate in which sexual abuse could occur. In addition to this, children and young people may sometimes be forced to watch the sexual abuse of their mother/carer. This can have long-lasting effects on the sexual and emotional development of the child/young person.

Economic: The parent or carer of the child or young person may have limited control over the family finances. Therefore, there might be little or no money available for extracurricular activities, clothing or even food, impacting on their health and development.

Emotional: Children and young people will often be very confused about their feelings – for example, loving both parents/carers but not wanting the abuse to continue. They may be given negative messages about their own worth, which may lead to them developing low self-esteem. Many children and young people feel guilty, believing that the abuse is their fault. They are often pessimistic about their basic needs being met and can develop suicidal thoughts. Some children and young people may internalise feelings and appear passive and withdrawn or externalise their feelings in a disruptive manner.

Isolation: Children and young people may become withdrawn and isolated; they may not be allowed out to play; and if there is abuse in the home they are less likely to invite their friends round. Schooling may be disrupted in many ways, and this may contribute to their growing isolation. They may frequently be absent from school as they may be too scared to leave their mother alone. They may have to move away from existing friends and family – e.g. into a refuge or other safe or temporary accommodation.

Threats: Children and young people are likely to have heard threats to harm their mother/father. They may have been directly threatened with harm or heard threats to harm their pet. They also live under the constant and unpredictable threat of violence, resulting in feelings of intimidation, fear and vulnerability, which can lead to high anxiety, tension, confusion and stress.

This clearly highlights that living with domestic abuse has a significant impact on a child's ability to achieve the five outcomes as outlined in the *Every Child Matters* agenda:

- be healthy;
- stay safe;
- enjoy and achieve;
- make a positive contribution;
- achieve economic well-being.

What you might see in school

- unexplained absences or lateness – either from staying at home to protect their parent or hide their injuries, or because they are prevented from attending school;
- children and young people attending school when ill rather than staying at home;
- children and young people not completing their homework, or making constant excuses, because of what is happening at home;
- children and young people who are constantly tired, on edge and unable to concentrate through disturbed sleep or worrying about what is happening at home;
- children and young people displaying difficulties in their cognitive and school performance;
- children and young people whose behaviour and personality changes dramatically;
- children and young people who become quiet and withdrawn and have difficulty in developing positive peer relations;
- children and young people displaying disruptive behaviour or acting out violent thoughts with little empathy for victims;
- children and young people who are no trouble at all.

This list is not exhaustive – this is intended to give you an idea of some of the types of behaviour that could be presented.

What schools can do

Schools can create an environment which both promotes their belief and commitment that domestic abuse is not acceptable, and that they are willing to discuss and challenge it.

For many victims, the school might be the one place that they visit without their abusive partner.

It would help if schools displayed posters or had cards/pens available with information about domestic abuse and contact details for useful agencies: for example, NSPCC 0808 800 5000; ChildLine 0800 1111; Parent line 0808 800 2222; Women's Aid 0808 2000 247.

Research shows that the repeated use of physical, sexual, psychological and financial abuse is one of the ways in which male power is used to control women. The underlying attitudes which legitimate

and perpetuate violence against women should be challenged by schools as part of the whole school ethos.

Schools can support individual children and young people by:

- introducing a whole-school philosophy that domestic abuse is unacceptable;
- responding to disclosures and potential Child Protection concerns; recognising that domestic abuse and forced marriage may be a Child Protection concern; policies and procedures must include domestic abuse;
- giving emotional support – the child or young person might need referral to a more specialist service or need additional support to complete coursework, exams etc;
- facilitating a peer support network – children and young people can become isolated but often welcome talking to friends about their problems;
- offering practical support – if children or young people are new to the school they may not yet have a uniform, they may also need financial help with extra-curricular activities, or they may be unfamiliar with the syllabus, the area, where to hang out, etc.;
- providing somewhere safe and quiet to do their homework or just to sit and think;
- Improving the self-esteem and confidence of children and young people by: o offering them opportunities to take on new roles and responsibilities;
  - o offering tasks which are achievable and giving praise and encouragement; o monitoring their behaviour and setting clear limits;
  - o criticising the action, not the person;
  - o helping them to feel a sense of control in their school lives; o involving them in decision making;
  - o helping them to be more assertive; o respecting them as individuals;
  - o encouraging involvement in extra-curricular activities.

From The Expect Respect Education Toolkit – Women's Aid

Advice for schools on receiving notification of a domestic abuse incident

Background

Following a call to a domestic abuse incident where children are involved, schools will be notified through Operation Encompass or the relevant local police notification route. The DSL will record and act on the information as safeguarding intelligence, share it only on a need-to-know basis and consider whether wider support or a referral is required.

Temporary accommodation notifications must be handled in the same safeguarding-intelligence way: record the notification, consider immediate and emerging risk, assess attendance and welfare impact, and coordinate support with parents/carers and relevant agencies where appropriate.

School action

On receiving this information, the DSL should**:**

- Log the information and keep the record alongside other information/concerns that the school has on this child/family, with all other confidential CP records in a secure place. This will allow the school to recognise any pattern and/or frequency of notifications and take appropriate action. **Please note that school may receive further communication about this same incident, once further assessment of the situation has been undertaken by Police – be careful not to log this as a separate incident.**
- Inform any staff of notification on a 'need to know' only basis – e.g. class teacher/form tutor.

- Alert all staff who teach pupil with minimum of information – e.g. 'This pupil may need extra support / may need extra time to complete homework'.

- Monitor pupil behaviour in school (including attendance) and should concerns arise which may be attributed to the impact of the incident, consult with Children's Social Care as the concerns may be significant and lead to new safeguarding action, or to seek advice on how to proceed.

- Provide appropriate support for child, **if required** – do not question pupil about the incident. Respect the child's decision on whether or not they wish to discuss the situation.

- Provide appropriate support for adult, **if asked** – e.g. helpline number or website address.

Bear in mind

- Victim of incident may be anxious that the information will be shared inappropriately.

- Notification may not give details as to which parent is the perpetrator/victim – any disclosure to the 'wrong' parent could heighten risk.

- Need to be aware who is 'connected' to the child – e.g. TA/lunchtime supervisor may be child's relative / friend of the family.

- **Inappropriate sharing of information could heighten the risk for the victim and/or the child.**

If in doubt, consult with either Children's Social Care or the Senior Adviser for Safeguarding Children in Education.

Annex 8 Radicalisation and Extremism

Preventing Radicalisation

Training and CPD
Prevent training for staff will now explicitly include digital radicalisation pathways and reporting mechanisms for online material, as well as strengthened links to online filtering processes and home-school support.

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harm and abuse, protecting children from this risk should be a part of a school's safeguarding approach.

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

- Negate or destroy the fundamental rights and freedoms of others; or
- Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- Intentionally create a permissive environment for others to achieve the results outlined in either of the above points

Radicalisation-refers to the process of a person legitimising support for,or use of, terrorist violence

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

What is Prevent?

Prevent is the Government's strategy to stop people becoming terrorists or supporting terrorism, **in all its forms**. Prevent works at the pre-criminal stage by using early intervention to encourage individuals and communities to challenge extremist and terrorist ideology and behaviour.

The Counter-Terrorism and Security Act (2015), places a duty on specified authorities, including schools and colleges, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty"). The Prevent duty reinforces existing duties placed upon educational establishments for keeping children safe by:

- ensuring a broad and balanced curriculum is in place schools to promote the spiritual, moral, social and cultural development of pupils;
- assessing the risk of pupils being drawn into extremist views;
- ensuring safeguarding arrangements by working in partnership with local authorities, police and communities;
- training staff to provide them with the knowledge and ability to identify pupils at risk;
- keeping pupils safe online, using effective filtering and usage policies.

What is Channel?

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism, Prevent referrals may be passed to a multi-agency Channel Panel, who will discuss the individual referred to

determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from school may be asked to attend the Channel Panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at Channel Guidance.

Warning Signs/Indicators of Concern

There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors. It is vital that school staff are able to recognise those vulnerabilities. However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

Factors which may make pupils more vulnerable may include:

- **Identity Crisis**: the pupil is distanced from their cultural/religious heritage and experiences discomfort about their place in society.
- **Personal Crisis:** the pupil may be experiencing family tensions; a sense of isolation; low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.
- **Personal Circumstances**: migration; local community tensions and events affecting the pupil's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- **Unmet Aspirations**: the pupil may have perceptions of injustice; a feeling of failure; rejection of civic life.
- **Experiences of Criminality**: involvement with criminal groups, imprisonment, poor resettlement or reintegration.
- **Special Educational Need:** pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.
- substance and alcohol misuse;
- pressure;
- influence from older people or via the Internet;
- bullying;
- domestic violence;
- race/hate crime.

Behaviours which may indicate a child is at risk of being radicalised or exposed to extremist views could include:

- being in contact with extremist recruiters and/or spending increasing time in the company of other suspected extremists;
- loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- pupils accessing extremist material online, including through social networking sites;
- possessing or accessing materials or symbols associated with an extremist cause;
- using extremist narratives and a global ideology to explain personal disadvantage;

- pupils voicing opinions drawn from extremist ideologies and narratives, this may include justifying the use of violence to solve societal issues;
- graffiti symbols, writing or art work promoting extremist messages or images;
- significant changes to appearance and/or behaviour increasingly centred on an extremist ideology, group or cause;
- changing their style of dress or personal appearance to accord with the group;
- Attempts to recruit others to the group/cause;
- using insulting to derogatory names for another group;
- increase in prejudice-related incidents committed by that person – these may include:

o physical or verbal assault;

o provocative behaviour; o damage to property;

o derogatory name calling;

o possession of prejudice-related materials; o prejudice related ridicule or name calling; o inappropriate forms of address;

o refusal to co-operate;

o attempts to recruit to prejudice-related organisations;

o condoning or supporting violence towards others;

o Parental reports of changes in behaviour, friendship or actions and requests for assistance;

o Partner schools, local authority services, and police reports of issues affecting pupils in other schools.

Referral Process

All concerns about young people vulnerable to radicalisation should be referred to the DSL in the first instance. The DSL will follow safeguarding procedures to gather information and determine if further action is required. This may include:

- talking to the young person about their behaviour/views/on-line activity/friends etc;
- discussion with parents/carers about the concerns;
- checking out on-line activity, including social media if possible;
- providing in-house support, if available;
- providing Early Help targeted support if necessary.

If concerns persist, then the DSL should follow their local safeguarding partners local procedures in relation to referrals to the Channel Panel.

Worcestershire lead:
Contact: Paul Kinsella, pkinsella@worcestershire.gov.uk

https://www.worcestershire.gov.uk/info/20003/council_democracy_and_councillor_information/1244/prevent ion_of_extremism_and_radicalisation

Warwickshire:

https://www.safeguardingwarwickshire.co.uk/safeguarding-children/i-work-with-children-and-young-people/prev

Annex 9 Female Genital Mutilation (FGM) and Breast Ironing – a form of Human Rights Abuse

What is FGM?

FGM includes procedures that intentionally alter or injure the female genital organs for non-medical reasons.

There are four known types of FGM, all of which have been found in the UK:

> **Type 1** – clitoridectomy: partial or total removal of the clitoris and, in very rare cases, only the prepuce (the fold of skin surrounding the clitoris)
>
> **Type 2** – excision: partial or total removal of the clitoris and the labia minora, with or without excision of the labia majora (the labia are the 'lips' that surround the vagina)
>
> **Type 3** – infibulation: narrowing of the vaginal opening through the creation of a covering seal. The seal is formed by cutting and repositioning the inner, or outer, labia, with or without removal of the clitoris
>
> **Type 4** – other: all other harmful procedures to the female genitalia for non-medical purposes, e.g., pricking, piercing, incising, scraping and cauterising the genital area.

FGM is sometimes known as 'female genital cutting' or female circumcision. Communities tend to use local names for this practice, including 'sunna'.

Why is FGM carried out?

It is believed that:

- it brings status and respect to the girl and that it gives a girl social acceptance, especially for marriage;
- it preserves a girl's virginity/chastity;
- it is part of being a woman as a rite of passage;
- it upholds the family honour;
- it cleanses and purifies the girl;
- it gives the girl and her family a sense of belonging to the community;
- it fulfils a religious requirement believed to exist;
- it perpetuates a custom/tradition;
- it helps girls and women to be clean and hygienic;
- it is cosmetically desirable;
- it is mistakenly believed to make childbirth safer for the infant.

Religion is sometimes given as a justification for FGM. For example, some people from Muslim communities argue that the Sunna (traditions or practices undertaken or approved by the prophet Mohammed) recommends that women undergo FGM, and some women have been told that having FGM will make them 'a better Muslim'. However, senior Muslim clerics at an international conference on FGM in Egypt in 2006 pronounced that FGM is not Islamic, and the London Central Mosque has spoken out against FGM on the grounds that it constitutes doing harm to oneself or to others, which is forbidden by Islam.

Within which communities is FGM known to be practised?

According to the Home Office it is estimated that up to 24,000 girls under the age of 15 are at risk of FGM.

UK communities that are most at risk of FGM include Kenyan, Somali, Sudanese, Sierra Leoni, Egyptian, Nigerian and Eritrean, as well as non-African communities including Yemeni, Afghani, Kurdish, Indonesian and Pakistani.

Obviously, this not to say that all families from the communities listed above practise FGM, and many parents will refuse to have their daughters subjected to this procedure. However, in some communities a great deal of pressure can be put on parents to follow what is seen as a cultural or religious practice.

Is FGM harmful?

FGM is extremely harmful and is often described as brutal because of the way it is carried out, and its short and long term effects on physical and psychological health.

FGM is carried out on children between the ages of 0 and 15, depending on the community in which they live. It is often carried out without any form of sedation and without sterile conditions. The girl or young woman is held down while the procedure of cutting takes place and survivors describe extreme pain, fear and feelings of abandonment.

Where the vagina is cut and then sewn up, only a very small opening may be left. This is often seen as a way to ensure that when the girl enters marriage, she is a virgin. In some communities the mother of the future husband and the girl's own mother will take the girl to be cut open before the wedding night.

Repeat urinal tract infections are a common problem for women who have undergone FGM, and for some, infections come from menstruation being restricted. Many women have problems during pregnancy and childbirth. The removal of the clitoris denies women physical pleasure during sexual activity and some groups will practise complete removal to ensure chastity.

Is it illegal?

FGM is internationally recognised as a violation of the human rights of girls and women, and is illegal in most countries – including the UK. The Female Genital Mutilation Act 2003 came into force in 2004:

The act makes it illegal to:

- practise FGM in the UK;
- take girls who are British nationals or permanent residents of the UK abroad for FGM, whether or not it is lawful in that country;
- aid and abet, counsel or procure the carrying out of FGM abroad.

The offence carries a penalty of up to 14 years in prison, and/or a fine.

Signs, symptoms and indicators

The following list of possible signs and indicators are not diagnostic, but are offered as a guide as to what kind of things should alert professionals to the possibility of FGM.

Things that may point to FGM happening:

- a child talking about getting ready for a special ceremony;
- a family arranging a long break abroad;
- a child's family being from one of the 'at-risk' communities for FGM (see above);
- knowledge that an older sibling has undergone FGM;
- a young person talks of going abroad to be 'cut', or get ready for marriage.

Things that may indicate a child has undergone FGM:

- prolonged absence from school or other activities;
- behaviour change on return from a holiday abroad, such as the child being withdrawn and appearing subdued;
- bladder or menstrual problems;
- finding it difficult to sit still, and looking uncomfortable;
- complaining about pain between their legs;
- mentioning something somebody did to them that they are not allowed to talk about;
- secretive behaviour, including isolating themselves from the group;
- reluctance to take part in physical activity;
- repeated urinal tract infection;
- disclosure.

Mandatory Reporting Duty

Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by Section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to personally report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. Further information on when and how to make a report can be found in the following Home Office guidance: 'Mandatory Reporting of Female Genital Mutilation - procedural information' (January 2020).

What is breast ironing?

Breast Ironing is practiced in some African countries, notably Cameroon. Girls aged between 9 and 15 have hot pestles, stones or other implements rubbed on their developing breast to stop them growing further. In the vast majority of cases breast ironing is carried out by mothers or grandmothers and the men in the family are unaware. Estimates range between 25% and 50% of girls in Cameroon are affected by breast ironing, affecting up to 3.8 million women across Africa.

Why does breast ironing happen?

The practice of breast ironing is seen as a protection to girls by making them seem 'child-like' for longer and reduce the likelihood of pregnancy. Once girls' breasts have developed, they are at risk of sexual harassment, rape, forced marriage and kidnapping; consequently, breast ironing is more prevalent in cities. Cameroon has one of the highest rates of literacy in Africa and ensuring that girls remain in education is seen as an important outcome of breast ironing.

Breast ironing is physical abuse

Breast ironing is a form of physical abuse that has been condemned by the United Nations and identified as Gender-based Violence. Although, countries where breast ironing is prevalent have ratified the African Charter on Human Rights to prevent harmful traditional practices, it is not against the law.

Breast ironing does not stop the breasts from growing, but development can be slowed down. Damage caused by the 'ironing' can leave women with malformed breasts, difficulty breastfeeding or producing milk, severe chest pains, infections and abscesses. In some cases, it may be related to the onset of breast cancer.

Breast Ironing in the UK

Concerns have been raised that breast ironing is also to be found amongst African communities in the UK, with as many as 1000 girls at risk. *Keeping Children Safe in Education* mentions breast ironing, as part of the section on so-called 'honour-based' abuse. Staff worried about the risk of breast ironing in their school should speak to the Designated Safeguarding Lead as soon as possible. Schools need to know the risk level within their communities and tackle the risk as appropriate.

What should schools do?

Where schools have a concern about a child, they should contact Children's Social Care Services. If the concerns are based on more concrete indicators – i.e., the young person says this is going to happen to them, or disclosure that it has happened to them or to an older sister – schools should make a Child Protection referral and inform the Police as required by the mandatory reporting duty. Schools should not:

- contact the parents before seeking advice from Children's Social Care;
- make any attempt to mediate between the child/young person and parents.

It is important to keep in mind that the parents may not see FGM or Breast Ironing as a form of abuse; however, they may be under a great deal of pressure from their community and or family to subject their daughters to it. Some parents from identified communities may seek advice and support as to how to resist and prevent FGM for their daughters, and education about the harmful effects of FGM and Breast Ironing may help to make parents feel stronger in resisting the pressure of others in the community. Remember that religious teaching does not support FGM or Breast Ironing.

The 'one chance' rule

In the same way that we talk about the 'one chance rule' in respect of young people coming forward with fears that they may be forced into marriage, young people disclosing fears that they are going to be sent abroad for FGM are taking the 'one chance' of seeking help.

It is essential that we take such concerns seriously and act without delay. Never underestimate the determination of parents who have decided that it is right for their daughter to undergo FGM. Attempts to mediate may place the child/young person at greater risk, and the family may feel so threatened at the news of their child's disclosure that they bring forward their plans or take action to silence her.

Annex 10 Forced Marriage – a form of domestic abuse and a crime in England and Wales

Forced Marriage should be recognised as a human rights abuse – and should always invoke Child Protection procedures within the Academy.

A forced marriage is one entered into without the full and free consent of one or both parties, and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical, emotional or psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Some communities use religion and culture as a way to coerce a person into marriage.

A forced marriage is not the same as an arranged marriage – in an arranged marriage the families take a leading role in choosing the marriage partner. The marriage is entered into freely by both people.

Warning signs

Warning signs can include a sudden drop in performance, truancy from lessons and conflicts with parents over continuation of the pupil's education.

There may be excessive parental restrictions and control, a history of domestic abuse within the family, or extended absence through sickness or overseas commitments. Pupils may also show signs of depression or self-harming, and there may be a history of older siblings leaving education early to get married.

The justifications

Most cases of forced marriage in the UK involve South Asian families. This is partially a reflection of the fact that there is a large established South Asian population in the UK. It is clear, however, that forced marriage is not a solely South Asian phenomenon — there have been cases involving families from East Asia, the Middle East, Europe and Africa.

Some forced marriages take place in the UK with no overseas element, while others involve a partner coming from overseas, or a British citizen being sent abroad. Parents who force their children to marry often justify it as protecting them, building stronger families and preserving cultural or religious traditions. They may not see it as wrong.

Forced marriage can never be justified on religious grounds: every major faith condemns it and freely given consent is a pre-requisite of Christian, Jewish, Hindu, Muslim and Sikh marriage.

Culture

Often parents believe that they are upholding the cultural traditions of their home countries, when in fact practices and values there have changed. Some parents come under significant pressure from their extended families to get their children married.

The law

Sexual intercourse without consent is rape, regardless of whether this occurs within the confines of a marriage. A girl who is forced into marriage is likely to be raped and may be raped until she becomes pregnant.

In addition, the Forced Marriage (Civil Protection) Act (2007) makes provision for protecting children, young people and adults from being forced into marriage without their full and free

consent through Forced Marriage Protection Orders. Breaching a Forced Marriage Protection Order is a criminal offence. It is illegal in England and Wales for children to be married under the age of 18 years old since February 2023

The Anti-Social Behaviour, Crime and Policing Act 2014 makes it a criminal offence, with effect from 16th June 2014, to force someone to marry. This includes:

- taking someone overseas to force them to marry (whether or not the marriage takes place);
- marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured into it or not).

Forced marriage may involve other criminal offences. Perpetrators — usually parents or family members — could be prosecuted for offences including: threatening behaviour, assault, kidnap, abduction, imprisonment and in the worse cases murder.

What to do if a pupil seeks help

- the pupil should be seen immediately in a private place, where the conversation cannot be overheard;
- the pupil should be seen on her own, even if she attends with others;
- develop a safety plan in case the pupil is seen i.e. prepare another reason why you are meeting;
- explain all options to the pupil and recognise and respect her wishes. If the pupil does not want to be referred to Children's Social Care, you will need to consider whether to respect the pupil's wishes — or whether the pupil's safety requires further action to be taken. If you take action against the pupil's wishes you must inform the pupil;
- establish whether there is a family history of forced marriage — i.e. siblings forced to marry;
- advise the pupil not to travel overseas and discuss the difficulties she may face;
- seek advice from the Forced Marriage Unit;
- liaise with Police and Children's Social Care to establish if any incidents concerning the family have been reported;
- refer to the local Police Child Protection Unit if there is any suspicion that there has been a crime or that one may be committed;
- refer the pupil with her consent to the appropriate local and national support groups, and counselling services.

What to do if the pupil is going abroad imminently

The Forced Marriage Unit advises education professionals to gather the following information if at all possible — it will help the unit to locate the pupil and to repatriate her:

- a photocopy of the pupil's passport for retention — encourage her to keep details of her passport number and the place and date of issue;
- as much information as possible about the family (this may need to be gathered discretely);
- full name and date of birth of pupil under threat;
- pupil's father's name;
- any addresses where the pupil may be staying overseas;
- potential spouse's name;
- date of the proposed wedding;
- the name of the potential spouse's father if known;
- addresses of the extended family in the UK and overseas.

Specific information

It is also useful to take information that only the pupil would know, as this may be helpful during any interview at an embassy or British High Commission — in case another person of the same age is produced pretending to be the pupil.

Professionals should also take details of any travel plans and people likely to accompany the pupil. Note also the names and addresses of any close relatives remaining in the UK and a safe means to contact the pupil — a secret mobile telephone, for example, that will function abroad.

Forced marriage: what educators should <u>not</u> do

- treat such allegations merely as domestic issues and send the pupil back to the family home;
- ignore what the pupil has told you or dismiss the need for immediate protection;
- approach the pupil's family or those with influence within the community, without the express consent of the pupil, as this will alert them to your concern and may place the pupil in danger;
- contact the family in advance of any enquires by the Police, Children's Social Care or the Forced Marriage Unit, either by telephone or letter;
- share information outside Child Protection information sharing protocols without the express consent of the pupil;
- breach confidentiality except where necessary in order to ensure the pupil's safety;
- attempt to be a mediator.

Further guidance is available from The Forced Marriage Unit:

Tel: (+44) (0)20 7008 0151 between 9.00 a.m. and 5.00 p.m. Monday to Friday

Emergency Duty Officer (out of hours): (+44) (0)20 7008 1500

E-mail: <u>fmu@fcdo.gov.uk</u>

Website: <u>www.fcdo.gov.uk/forcedmarriage</u>

FMU publication: '*Multi-Agency Practice Guidelines: Handling Cases of Forced Marriage' June 09*

See also: *'The Right to Choose – Multi-Agency Guidance in relation to Forced Marriage' Government Office - November 2008.*

Update to reflect changes to legislation in 2023

Annex 11 Child-on-child Sexual Violence and Sexual Harassment Guidance

Annex 11 update: The Trust adopts a zero-tolerance approach to child-on-child abuse, including harassment and violence, sexual harassment and sexual violence. The Trust recognises a progressive continuum from harmful sexual behaviour (HSB) through to sexual violence and will not tolerate responses that dismiss allegations as banter, part of growing up or "boys being boys". HSB can occur online, face-to-face or both and must always be considered within a child-protection context. Every report must lead to a proportionate safeguarding response for the victim, alleged perpetrator and wider peer group/context.

Annex 11 final KCSIE 2026 addition: when assessing HSB, DSLs must consider the ages, developmental stages, power dynamics, vulnerability, coercion and context of the children involved. Children's sexual behaviour exists on a continuum from developmentally expected to inappropriate, problematic, abusive or violent. DSLs should use current specialist guidance, including NSPCC resources on typical sexual development and responding to sexualised behaviour, and should know local specialist support routes for both victims and children who display HSB.

Child-on-Child Abuse, Family Help and Safety Planning

The school recognises that child-on-child abuse can occur both inside and outside of school and will be taken seriously, managed appropriately and never dismissed as banter, teasing, part of growing up or horseplay.

The school's **named lead for child-on-child abuse** is **Tanya Howarth (Headteacher)**.

Where concerns regarding child-on-child abuse are identified, staff must report these immediately to the Designated Safeguarding Lead through the school's safeguarding procedures. The school will undertake proportionate risk assessments and implement individual safety plans, where required, to safeguard all children involved.

The school uses a child-centred approach when responding to incidents of child-on-child abuse and will consider the needs of victims, alleged perpetrators and any other children affected.

Where additional support is required, referrals may be made through Worcestershire's Early Help arrangements or to the **Family Front Door**, which is the single point of access for Children's Social Care and targeted family support services. Telephone: **01905 822666**. Out-of-hours safeguarding concerns should be referred to the **Emergency Duty Team** on **01905 768020**.

Safety plans will be developed where appropriate by the Designated Safeguarding Lead in consultation with relevant staff, parents, carers and external agencies. Safety plans will be reviewed regularly following any incident, significant change in circumstances or at agreed review meetings to ensure they remain effective and appropriate.

Safety plans, risk assessments, actions taken and review outcomes will be recorded and monitored through **CPOMS** and reviewed by the Designated Safeguarding Lead as part of the school's ongoing safeguarding arrangements.

Sexual violence refers to criminal acts: rape, assault by penetration, sexual assault and causing someone to engage in sexual activity without consent, as defined by the Sexual Offences Act 2003.

Sexual harassment is defined as "unwanted conduct of a sexual nature" and can include sexual comments such as telling sexual stories or making lewd comments or sexual remarks about clothes and appearance and calling someone sexualised names, sexual jokes or taunting, physical behaviour (which may sometimes cross the line into sexual violence) such as grabbing bottoms, breasts and genitalia or pulling down trousers or flicking bras and lifting up skirts, deliberately brushing against someone or interfering with their clothes or displaying drawings or images of a sexual nature, online sexual harassment such as making or sharing nudes or semi-nudes images and/or videos, sharing of unwanted explicit content, sexualised online bullying, unwanted sexual messages and comments, sexual exploitation and upskirting. Upskirting is a criminal offence under the Voyeurism (Offences) Act 2019.

The Academy offers age-appropriate guidance to pupils through the curriculum, with a view to educating pupils about appropriate behaviour and consent and minimising and preventing the occurrence of incidents of sexual violence and sexual harassment. This includes guidance on protective behaviours, healthy relationships, consent, sex education and how to report concerns about themselves or their peers.

It is important to note that:

- sexual violence and sexual harassment can occur between two children of any age and sex or through a group of children sexually assaulting or sexually harassing a single child or group of children;
- incidents and behaviours related to sexual violence and sexual harassment can be associated with factors outside of school and staff should consider whether children are at risk of abuse or exploitation in situations outside their families;
- sexual violence and sexual harassment:
  - exist on a continuum and may overlap;
  - can occur online and/or face to face (both physical and verbal) and technology is a significant component in many cases;
  - are never acceptable.
- all victims must be taken seriously and offered appropriate support, regardless of how long it has taken them to come forward or whether it is abuse that has occurred online or offline;
- it is more likely that girls will be the victims of sexual violence and more likely that sexual harassment will be perpetrated by boys, however all child-on-child abuse is unacceptable and should be taken seriously. Children who are gender questioning or LGB), or perceived to be so, may also be particularly targeted by their peers;
- there is a zero tolerance approach to sexual violence and sexual harassment and it should be made clear that it is not "part of growing up", "banter", "just having a laugh" or "boys being boys" and this behaviour is always unacceptable and should not be dismissed or tolerated;
- children with special educational needs (SEN) and disabilities and lesbian, gay, bisexual and children who are questioning their gender are more vulnerable to sexual violence and harassment and additional barriers can exist when recognising abuse in these children;
- children may not find it easy to tell staff about their abuse verbally, but may show signs or act in ways that they hope adults will notice and react to;

- children may not make a direct report; staff may overhear a conversation that suggests a child has been harmed or a friend may make a report;
- certain children may face additional barriers to telling someone about abuse because of their vulnerability, disability, sex, ethnicity or sexual orientation;
- whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was;
- where the report includes an online element, staff must never view or forward illegal images of a child;
- an initial disclosure may only be the first incident reported, rather than representative of a singular incident, as trauma can impact memory and therefore children may not be able to recall all details or an accurate timeline of abuse;
- all staff should maintain an attitude of 'it could happen here', challenge inappropriate behaviours between peers (even if it appears to be relatively innocuous) and be aware that even if there are no reports of this type of abuse, it does not mean it is not happening.

Responding to reports of sexual violence or sexual harassment

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure.

The Academy's existing safeguarding reporting procedures should be followed with regard to incidents of sexual violence and sexual harassment, including those that have happened outside of school or online. The initial response to a report from a child is incredibly important and can encourage or undermine the confidence of future victims to come forward. Staff should act on any concerns immediately and the victim should be reassured that they are being taken seriously and that they will be supported and kept safe, as well as never being given the impression that they are creating a problem by reporting sexual violence or harassment or being made to feel ashamed for making a report.

Throughout the management of the incident and into the future, the needs and wishes of the victim are paramount. The alleged perpetrator(s) should also be safeguarded, supported and educated. They are likely to experience stress as a result of being the subject of allegations. Sanctions can occur at the same time. As with any safeguarding concern, confidentiality should not be promised. Ideally, two adults should be present, one of whom will preferably be the DSL or a Deputy DSL.

When a report of an incident of sexual violence or sexual harassment is made, before deciding what to do next, the DSL should consider the following:

- the wishes of the victim, balanced with school's duty and responsibilities to protect other children;
- the nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour;
- the age (particularly if there is more than two years' difference or if one child is pre-pubescent and the other is not), developmental stage and any power imbalance between children, including any ongoing risks;
- if the alleged incident is a one-off or a sustained pattern of abuse, sexual or otherwise;
- that sexual violence and sexual harassment can take place within intimate personal relationships between peers;
- whether there are ongoing risks to the victim, alleged perpetrator, other children or staff;
- whether a child displaying harmful sexual behaviours may be a victim of abuse themselves;
- any special educational needs and whether the SENCo needs to be involved;
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation;

- whether there are wider cultural issues within the school that enabled the inappropriate behaviour to occur.

One-off incidents of sexual harassment may be dealt with under the Academy's Behaviour and Discipline Policy or Anti-Bullying Policy, if it is the view of the DSL that the children concerned are not in need of early help or referrals to statutory services. The response should still be underpinned by the principle that there is a zero tolerance approach to sexual harassment.

For incidents of non-violent harmful sexual behaviours, an Early Help intervention may be appropriate. A referral should be considered for both the victim and the perpetrator.

For all incidents where a child has been harmed, is at risk of harm or in immediate danger, the case should be referred to Children's Social Care. The school should not wait for the outcome (pr even the start) of a social care investigation before protecting children in the school, although there should be close working with Children's Social Care to ensure actions taken do not jeopardise a statutory investigation. The risk assessment will help inform any decision and consideration of the victim, alleged perpetrator(s), any children directly involved in the incident and all other children at the school should be immediate. The DSL should be prepared to make a further referral to Children's Social Care if it is decided that a statutory intervention is not appropriate but they believe the child remains in immediate danger or at risk of harm. If a statutory assessment is not appropriate, the DSL should consider other support mechanisms such as Early Help, specialist support and pastoral support.

All incidents of sexual violence (rape, assault by penetration or sexual assault) should be reported to the police. This will generally be made in parallel with a referral to Children's Social Care. The police should agree with the school what information can be disclosed to staff and others, in particular the alleged perpetrator(s) and their parents/carers, and the best way to protect the victim.

Parents/carers will generally be informed unless there are compelling reasons not to, for example if to do so would put a child at additional risk.

It may be appropriate to complete a risk assessment (see Annex 15 for a template). In cases of sexual violence, a risk assessment must be put in place immediately. In cases of sexual harassment, the risk assessment should be considered on a case-by-case basis and a decision should be made as to whether the victim and alleged perpetrator(s) should be kept apart, with the emphasis on ensuring the victim can continue their normal routines. It is important the victim feels in as much control of the process as is reasonably possible. A risk assessment should consider the victim, the alleged perpetrator(s) and other children and staff at the Academy. It should also consider the context of the place where the risk was identified and what steps could be taken to reduce risk repetition. It should be shared with parents/carers. The risk assessment should be reviewed and updated regularly.

Appropriate disciplinary measures may be taken by the Academy. If there is an ongoing police or social care investigation this must not be jeopardised, but the Academy may still undertake its own disciplinary measures by considering the conduct of the alleged perpetrator(s) as part of their Behaviour and Discipline Policy and applying appropriate and proportionate consequences based on their own conclusions about what happened on 'the balance of probabilities', unless it is prejudicial or unreasonable to do so. The alleged perpetrator(s) must also be provided with support alongside any disciplinary measures.

If other pupils are affected, for example as witnesses, steps should be taken to provide support, to ensure the other children don't 'take sides' and to prevent victimisation of the victim or alleged perpetrator(s).

All concerns, discussion, decisions and reasons for decisions must be recorded on CPOMS. If one of the pupils involved moves schools, the DSL must liaise with the new school in relation to the incident.

The following situations are statutorily clear and must therefore always be referenced:

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape;
- rape, assault by penetration and sexual assault are defined in law;
- creating and sharing sexual photos and videos of under-18s is illegal (often referred to as making or sharing nudes or semi-nudes). This includes children making and sharing sexual images and videos of themselves and by using generative AI tools or platforms to make and create as well as distribute images.

Cases reported to the police

In criminal investigations, the legal right to anonymity must be borne in mind, for example in relation to social media. The Academy will take steps to prevent this legal right being disregarded, as far as is possible.

If cases reported to the police result in a conviction or caution, the Behaviour and Discipline Policy will be followed. This may involve consideration of permanent exclusion. If the perpetrator remains in school, plans will be made for the future, including any required behavioural expectations or conditions. If the alleged perpetrator(s) is/are found not guilty or if no further action is taken, arrangements will be made to support both the victim and the alleged perpetrator(s).

In cases of sexual violence, the alleged perpetrator(s) should be moved from any shared classes with the victim whilst the facts of the case are established. Consideration should also be given to any other shared spaces within the Academy and the journey from home to school and back again, looking at how best to keep the victim and alleged perpetrator(s) a reasonable distance apart.

Ongoing considerations

Once the next steps have been determined in terms of progressing any report of sexual violence or sexual harassment, the DSL should again consider the question of the victim and alleged perpetrator(s) sharing classes and spaces at school, considering both the duty to safeguarding children and the duty to educate them (consider age, developmental stage of the alleged perpetrator(s) and the nature of the allegations, as well as the proportionality of the response). Risk assessments should be updated as appropriate.

Where there is a criminal investigation, the alleged perpetrator(s) should remain removed from any classes shared with the victim and a reasonable distance maintained around the school and on the journey to and from school.

Where a criminal investigation leads to a conviction or caution, the Academy should take suitable action, if not already done so. Rape or assault by penetration is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator(s) to remain in the same school would seriously harm the education or welfare of the victim, and possible other children at the school. Sexual assault may also consider permanent exclusion amongst any other suitable sanctions in light of the behaviour policy. Where the decision is that the perpetrator(s) will remain at the school, the principle would be to continue keeping the victim and perpetrator(s) separated. The exact nature of the conviction or caution, as well as the wishes of the victim, will be important in determining how to proceed. The school should update their risk assessment to ensure relevant

protections are in place for all children at the school and the expectations regarding the perpetrator should be made very clear.

Reports of sexual assault and sexual harassment may not lead to a report to the police, or if reported may not be progressed or may result in a 'not guilty' verdict. It is important to note that this does not necessarily mean that the offence did not happen or that the victim lied. Appropriate support should be provided to both the victim and the alleged perpetrator(s) and consideration given to sharing classes and potential contact. Again, this should be considered with the needs and wishes of the victim at the heart of the process, supported by parents/carers as required. Any arrangements should be kept under review.

School can be a significant protective factor for children who have displayed harmful sexual behaviour and continued access to school, with a comprehensive safeguarding management plan in place, is an important factor to consider. It is important they are given the correct support to try to stop them re-offending and to address any underlying trauma that may be causing this behaviour. If an alleged perpetrator moves to another school, it is important that the new setting is made aware of any ongoing support needs and potential risks to others.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider whether the child or person who made the allegation is in need of help or may have been abused by someone else and this is a cry for help. If a report is shown to be deliberately invented or malicious, disciplinary action should be considered for the individual who made it.

Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre s(SARC) in the form of medical, practical and emotional care and advice, regardless of when the incident occurred. Support can also be sought from Early Help, Children and Young People's Independent Sexual Violence Advisors (ChISVAs), CAMHS, Rape Crisis, The Survivors Trust, Male Survivors Partnership and/or NHS, amongst others.

Safeguarding and supporting children who display HSB

i. The school/college will balance the need to safeguard the victim and the wider pupil/student body with the need to provide the child displaying HSB with education, safeguarding support and proportionate disciplinary consequences. These actions are not mutually exclusive.
ii. The response will consider age and developmental stage, the nature and frequency of the behaviour, proportionality, risk to others and any unmet needs. HSB in younger children may be a sign of their own abuse, trauma or exposure to abusive practices or materials. Advice will be sought as appropriate from children's social care, the police and specialist HSB or sexual violence services.
iii. Support will address underlying trauma or unmet needs, aim to prevent repetition or escalation, and be reflected in an individual safety and support plan. Any exclusion decision will be lawful, reasonable and fair.

Annex 12 making or sharing nudes or semi-nudes images and/or videos

Annex 12 update: Across this policy, the final KCSIE 2026 terminology is “making or sharing nudes or semi-nudes”. This covers the creation, sending or posting of nude or semi-nude images by young people under the age of 18. “Images” includes photographs, videos and livestreams; images may be taken by the child, taken or created by another person, digitally altered, or wholly generated using artificial intelligence, including deepfakes or deep nudes. All incidents, whether described as consensual or non-consensual, require a safeguarding response that considers age, development, coercion, exploitation, vulnerability, consent, criminality, online spread and immediate risk.

What is making or sharing nudes or semi-nudes?

making or sharing nudes or semi-nudes is the exchange of self-generated sexually explicit images, through mobile picture messages or webcams over the internet.

making or sharing nudes or semi-nudes is often seen as flirting by children and young people who think that it's part of normal life.

Often, incidents of making or sharing nudes or semi-nudes are not clear-cut or isolated; schools may encounter a variety of scenarios. making or sharing nudes or semi-nudes incidents can be divided into two categories – aggravated and experimental:

Aggravated incidents of making or sharing nudes or semi-nudes involve criminal or abusive elements beyond the creation of an image. These include further elements, adult involvement or criminal or abusive behaviour by minors such as sexual abuse, extortion, threats, malicious conduct arising from personal conflicts, or creation or sending or showing of images without the knowledge or against the will of a minor who is pictured.

Experimental incidents of making or sharing nudes or semi-nudes involve youths taking pictures of themselves to share with established boy or girlfriends, to create romantic interest in other youth, or for reasons such as attention seeking. There is no criminal element (and certainly no criminal intent) beyond the creation and sending of the images and no apparent malice or lack of willing participation.

The consequences of making or sharing nudes or semi-nudes can be devastating for young people. In extreme cases it can result in suicide or a criminal record, isolation and vulnerability. Young people can end up being criminalised for sharing an apparently innocently image which may have, in fact, been created for exploitative reasons.

Because of the prevalence of making or sharing nudes or semi-nudes, young people are not always aware that their actions are

illegal. In fact, making or sharing nudes or semi-nudes as a term is not something that is recognised by young people and the ‘cultural norms’ for adults can be somewhat different. Some celebrities have made comments which appear to endorse making or sharing nudes or semi-nudes – ‘it’s okay, as long as you hide your face’ - giving the impression that making or sharing nudes or semi-nudes is normal and acceptable. However, in the context of the law it is an illegal activity and young people must be made aware of this.

The Law - Much of the complexity in responding to making or sharing nudes or semi-nudes is due to its legal status. Making, possessing and distributing any imagery of someone under 18 which is ‘indecent’ is illegal. This includes imagery of yourself if you are under 18. ‘Indecent’ is not defined in legislation. For most purposes, if imagery contains a naked young person, a topless girl, and/or displays genitals or sex acts, including masturbation, then it will be considered indecent. Indecent images may also include overtly sexual images of young people in their underwear.

The law criminalising nudes or semi-nudes of children was created long before mass adoption of the internet, mobiles and digital photography. It was also created to protect children and young people from adults seeking to sexually abuse them or gain pleasure from their sexual abuse. It was not intended to criminalise children. Despite this, young people who share sexual imagery of
themselves, or peers, are breaking the law.

The National Police Chiefs Council (NPCC) has made clear that incidents involving making or sharing nudes or semi-nudes should primarily be treated as safeguarding issues. Schools may respond to incidents without involving the police. Where the police are notified of incidents of making or sharing nudes or semi-nudes they are obliged, under the Home Office Counting Rules and National Crime Recording Standards, to record the incident on their crime systems. The incident will be listed as a 'crime 'and the young person involved will be listed as a 'suspect. 'This is not the same as having a criminal record.

Every 'crime' recorded on police systems has to be assigned an outcome from a predefined list of outcome codes. As of January 2016 the Home Office launched a new outcome code (Outcome 21) to help formalise the discretion available to the police when handling crimes such as making or sharing nudes or semi-nudes. This means that even though a young person has broken the law and the police could provide evidence that they have done so, the police can record that they chose not to take further action as it was not in the public interest.

Step 1 – Disclosure by a pupil

Action to take in the case of an incident of making or sharing nudes or semi-nudes, disclosures should follow the normal safeguarding practices and protocols. A pupil is likely to be very distressed especially if the image has been circulated widely and if they don't know who has shared it, seen it or where it has ended up. They will need pastoral support during the disclosure and after the event. They may even need immediate protection or a referral to Children's Social Care.

The following questions will help decide upon the best course of action:

- is the pupil disclosing about themselves receiving an image, sending an image or sharing an image?;
- what sort of image is it? Is it potentially illegal or is it inappropriate?;
- are the school Child Protection and safeguarding policies and practices being followed? For example, has the DSL been consulted and is their advice and support available?;
- how widely has the image been shared and is the device in their possession?;
- is it a school device or a personal device?;
- does the pupil need immediate support and or protection?;
- are there other pupils and or young people involved?;
- do they know where the image has ended up?

This situation will need to be handled very sensitively. Whatever the nature of the incident, ensure school safeguarding and Child Protection policies and practices are adhered to.

Step 2 – Searching a device (for further information on searching, screening and confiscation, see Annex 13)

It is highly likely that the image will have been created and potentially shared through mobile devices. The image may not be on one single device, but may be on a website or on a multitude of devices; it may be on either a school-owned or personal device. It is important to establish the

location of the image but be aware that this may be distressing for the young person involved, so be conscious of the support they may need.

When searching a mobile device the following conditions should apply:

- the action is in accordance with the school's Child Protection and safeguarding policies;
- the search is conducted by the head teacher or a person authorised by them;
- a member of the safeguarding team is present;
- the search is conducted by a member of the same sex.

If any illegal images of a child are found you should consider whether to inform the police. As a general rule it will almost always be proportionate to refer any incident involving "aggravated" sharing of images to the police, whereas purely "experimental" conduct may proportionately be dealt with without such referral, most particularly if it involves the child sharing images of themselves.

Any conduct involving, or possibly involving, the knowledge or participation of adults should always be referred to the police.

If an "experimental" incident is not referred to the police the reasons for this should be recorded in writing.

Always put the child first. Do not search the device if this will cause additional stress to the pupil/person whose image has been distributed.

If there is an nude or semi-nude image of a child on a website or a social networking site then you should report the image to the site hosting it. In the case of a making or sharing nudes or semi-nudes incident involving a child or young person where you feel that they may be at risk of abuse then you should report the incident directly to CEOP www.ceop.police.uk/ceop-report, so that law enforcement can make an assessment, expedite the case with the relevant provider and ensure that appropriate action is taken to safeguard the child.

Step 3 – What to do and <u>not</u> do with the image

If the image has been shared across a personal mobile device:

- confiscate and secure the device;
- don't view the image unless there is a clear reason to do so;
- don't send, share or save the image anywhere;
- don't allow pupils to view images or send, share or save them anywhere.

If the image has been shared across a school network, a website or social network:

- block the network to all users and isolate the image;
- don't send or print the image;
- don't move the material from one place to another;
- don't view the image outside of the protocols of your safeguarding policies and procedures.

Step 4 – Who should deal with the incident?

Whoever the initial disclosure is made to must act in accordance with the school Safeguarding Policy, ensuring that the DSL or a senior member of staff is involved in dealing with the incident.

The DSL should always record the incident. Senior management should also always be informed. There may be instances where the image needs to be viewed and this should be done in accordance with protocols. The best interests of the child should always come first; if viewing the image is likely to cause additional stress, staff should make a judgement about whether or not it is appropriate to do so.

Step 5 - Deciding on a response

There may be a multitude of reasons why a pupil has engaged in making or sharing nudes or semi-nudes – it may be a romantic/sexual exploration scenario or it may be due to coercion.

It is important to remember that it won't always be appropriate to inform the police; this will depend on the nature of the incident. However, as a school it is important that incidents are consistently recorded. It may also be necessary to assist the young person in removing the image from a website or elsewhere.

If nudes or semi-nudes of a child are found:

- act in accordance with your Child Protection and Safeguarding Policy, e.g. notify DSL;
- store the device securely;
- carry out a risk assessment in relation to the young person (see Appendix B of the Safeguarding Children in Education Guidance for a nudes/semi-nudes risk assessment pro-forma and flow chart)
- make a referral if needed;
- contact the police (if appropriate);
- put the necessary safeguards in place for the pupil, e.g. they may need counselling support, immediate protection and parents must also be informed;
- inform parents and/or carers about the incident and how it is being managed.

Step 6 – Contacting other agencies (making a referral)

If the nature of the incident is high-risk, consider contacting Children's Social Care. Depending on the nature of the incident and the response you may also consider contacting local police or referring the incident to CEOP.

Understanding the nature of the incident, whether experimental or aggravated, will help to determine the appropriate course of action.

Step 7 – Containing the incident and managing pupil reaction

Sadly, there are cases in which victims of making or sharing nudes or semi-nudes have had to leave or change schools because of the impact the incident has had on them. The pupil will be anxious about who has seen the image and where it has ended up. They will seek reassurance regarding its removal from the platform on which it was shared. They are likely to need support from the school, their parents and their friends. Education programmes can reinforce to all pupils the impact and severe consequences that this behaviour can have. Consider engaging with your local police and asking them to talk to the pupils.

Other staff may need to be informed of incidents and should be prepared to act if the issue is continued or referred to by other pupils. The school, its pupils and parents should be on high alert, challenging behaviour and ensuring that the victim is well cared for and protected. The pupils' parents should usually be told what has happened so that they can keep a watchful eye over their child, especially when they are online at home.

Creating a supportive environment for pupils in relation to the incident is very important.

Step 8 – Reviewing outcomes and procedures to prevent further incidences

As with all incidents, a review process ensures that the matter has been managed effectively and that the school has the capacity to learn and improve its handling procedures. Incidents of making or sharing nudes or semi-nudes can be daunting for a school to manage, especially if the image has been widely shared between pupils in school.

Further information is available from the NSPCC.

Annex 13 Searching, Screening and Confiscation

As a group of schools we follow the DfE guidance of July 2022 and will always try to ensure an appropriate adult is always with a child as per recommended in annex B KCSIE 2026 and PACE Code C 2019 .

Searching

- All staff may search a pupil for any item if the pupil agrees.
- Where there is no consent then only staff authorized by the Headteacher and the Headteacher themselves may search a pupil or their possessions – **where they have reasonable grounds of suspicion that the pupil may have a prohibited item: knives or weapons; alcohol; illegal drugs; stolen items; tobacco and cigarette papers; fireworks; pornographic images; any article that staff reasonably suspect may be used to commit an offence or cause injury to another person or damage to property.**
- Headteachers and authorised staff can search for items banned by the school that are written into the rules.

Confiscation

- School staff can seize any prohibited item found as a result of a search, or any other means if considered harmful or detrimental to school discipline.
- Under Article 8 of the European Convention for Human Rights ECHR – pupils have a right to respect for their private life and can expect a reasonable level of personal privacy.
- The right under Article 8 is not absolute, however, any interference must be justified and proportionate.
- Currently the powers to search in Education Act 1996 are compatible with Article 8.

Screening

- Schools can require pupils to undergo screening via walk-through or hand-held metal detectors, even if there is no suspicion and without consent of the pupils.
- As a duty to staff, visitors and pupils' safety this type of screening can be imposed.
- Any member of staff can screen pupils.
- If a pupil refuses to be screened they can be refused entry to the premises, this would not be an exclusion but would be treated as an unauthorised absence, as the pupil should comply with the rules and attend.
- As there is no physical contact this type of screening is not subject to the same conditions as the search without consent.

Search without consent

- The Headteacher and authorised staff can search without consent, for items previously listed.
- Searches should be carried out by someone of the same sex if at all possible and a witness, preferably of the same sex.
- The law also states that: Grounds for search are based on a reasonable suspicion of possession of a prohibited item.
- There is no requirement to provide search authorisation in writing, and training can be

provided if required by the Headteacher.

- The powers allow staff to search regardless of whether the pupil is found to have that item.

- Searches without consent can only take place when in lawful control of the pupil, in school or on a school trip.

- The powers only apply in England.

Electronic Devices

- Staff may lawfully search electronic devices without consent or parental permission, if there is a suspicion that the pupil has a device prohibited by school rules, or the staff member has good reason to suspect the device may be used to: cause harm; disrupt teaching; break school rules; commit an offence; cause personal injury; or damage property.

- Any data, files or images that are believed to be illegal must be passed to the police as soon as practicable, including pornographic images of children, without deleting them. These images should not be viewed by Academy staff, if avoidable.

- Any data, files or images that are not believed to be unlawful, may be deleted or kept as evidence of a breach of the school's Behaviour and Discipline Policy.

During the search

- Pupils are only required to remove outer garments of clothing when being searched.

- Outer garments are those not worn against the skin or the layer immediately over underwear, but include hats; shoes; boots; gloves and scarves.

- A pupil's possessions can only be searched in the presence of the pupil and another member of staff, except where there is a risk of serious harm if the search is not conducted immediately.

- The power to search without consent permits the removal of outer clothing and searching pockets: but not an intimate search going further than that, this is a Police matter.

- Members of staff can use force as is reasonable given the circumstances when conducting a search for the previously mentioned items.

- Force may not be used for items banned under the school rules.

Dealing with parents

- Schools are not required to inform parents before a search takes place or to seek consent to search their child.

- There is no legal requirement to make or keep a record of a search, but to ensure a full audit trail is maintained, an incident report should be completed and uploaded onto CPOMS. The report should detail the circumstances of the incident and the outcome.

- Schools should inform parents or guardians where alcohol, illegal drugs or potentially harmful substances are found, though there is no legal requirement to do so.

- Complaints about screening or searching should be dealt with through the normal school complaints procedure.

Annex 14 Restrictive interventions and Positive handling Policy

Our staff follow the Worcestershire preferred guidance and use Team Teach technique with training provided by Positive Behaviour Team as our providers of training and support plus advice. Schools across the Trust will have their own set of policies and procedures to ensure not only compliance with the law but to act in the best interests of the child.

This policy sets out the framework for the use of reasonable force in the form of holding, handling, escorting and in extreme circumstances physical intervening to prevent a greater harm from occurring, but it must be clearly understood that this should always be set within the school's overall behaviour management framework and is only used as a last resort under-pinned by sound risk assessment. Providing successful inclusion may necessitate physical restraint but only as one of the strategies available for the management of challenging behaviour. Only in the event of failure of clearly defined protocols to bring control to the situation, or imminent danger to persons, should such measures be considered. This does not prohibit force to be used as a first resort where it is necessary and proportionate to the circumstances to prevent a greater harm or greater perceived harm from occurring.

Legislation that came into force on 1 September 1998 (Section 550 of the Education Act 1996) together with national guidance (DfES Circular 10/98), establishes in a school setting the existing common law precedents allowing one to prevent harm to self, others and damage to property. It clearly sets out the powers of teachers and other staff to use reasonable force if required. This applies to all occasions when that member of staff is in charge of children both on and off school premises. The Criminal Justice and Immigration Act 2008 gives us the definition of reasonable force as using force only when necessary and then making sure that such force is proportionate to the harm, or perceived harm, avoided. There is no legal definition, reasonable force depends on the individual circumstances of each case and only a court may judge what is reasonable in terms of the amount of force used in physical handling or self-defence and obviously does so retrospectively.

Staff members are reminded that this is a "power" and not a duty, staff have a duty of care to themselves and others including the children in their care. Where a staff member feels that by exercising their power to intervene physically they may put themselves or the child in physical danger, or they feel that their intervening may cause a greater harm or is likely to fail, then they are advised to seek a safer alternative option.

Staff members should try to avoid injuring pupils, however in extreme circumstances this may not always be possible. Force cannot be used for revenge, retaliation, retribution or to teach someone a lesson. To reduce the risk of serious injury, methods of intervention to avoid include the following:

- holding a child around the neck, collar or other way that may restrict breathing;
- slapping, punching, kicking or tripping a child;
- holding or pulling a child by their hair or ear;
- twisting or forcing limbs against joints;
- indecently touching or holding;
  holding a child on the ground prone (face down) or supine (face up);
- use of basket holds – holding a child's arms across their body from behind (also known as a wrap);
- lifting a child off the floor in order to intimidate.

Note. An adult in charge of children has a responsibility to intervene in the event of the following types of incident. Types of incident where the use of force may be necessary are given as:

- action due to imminent risk of injury to themselves or others;
- action due to imminent risk of significant damage to property.

In some circumstances it may be possible to remove the rest of the children from the area and allow the child concerned to calm down safely. Where this presents a lesser risk of injury to all concerned this may be a more favourable option.

Definitions of restraint include: the positive application of force with the intention of overpowering the child or a positive containing experience for the child. Both refer to using holds or intervening only where it is absolutely necessary and where a non-physical method (verbal or non-verbal prompt) is either failing or is likely to fail.

The use of restraint requires skill, judgment and knowledge of a range of both non-harmful methods of control and restrictive methods of physical intervention. Reasonable force where used in circumstances which are necessary includes those methods taught and practised in the Edexcel Safer Handling (Care & Control) award certificate.

Where necessary, the degree of force employed must be in proportion to the perceived outcome of the incident, taking into consideration the severity of the behaviour or the consequences it is intended to prevent. Any force should always be the minimum needed to achieve the desired result with the highest degree of certainty (staff must use enough force for their intervention to be successful but not as to be excessive). The persons (unless it is an instinctive intervention or emergency action then there should always be a minimum of two staff physically intervening with a pupil) exercising the restraint must be authorised by the Headteacher and those who have received appropriate Edexcel Safer Handling Care & Control approved training that is in date.

Staff must take into account if the child has an individual risk assessment or a medical need and follow any guidelines mentioned. Individual staff risk assessments must be considered (see template Risk Assessment for the Use of Restraint below).

In the event of restraint becoming necessary, where appropriate before touching the child, the member of staff should advise the child calmly and repeatedly about what they are going to do and why, and how the child might change his/her behaviour, in order that the restraint would become unnecessary. If appropriate any other children and adults present should also be warned. **Note: this warning must not compromise safety or instigate any threat of unlawful attack.**

A second adult should always be present to assist with any holds to reduce the risk of the member of staff or child suffering bodily harm and as a witness if allegations of assault are made later by the child. Single person interventions should not be used as they are inconsistent with UK Law including Manual Handing regulations (Management of Health and Safety Regulations 1999). They are very difficult to risk assess, dangerous for those involved and put staff and pupils at risk.

However, this would not take away from a person intervening in an emergency should they deem it to be absolutely necessary to prevent a greater harm occurring which couldn't be safely controlled with a non-physical alternative. Staff are encouraged to win time to call for help and manage their personal space as an alternative to physically intervening on their own.

While intervening, the member of staff must:

- minimise the amount of time where the child is restrained;
- avoid prolonged struggling;
- wherever possible keep talking to the child and give choices as to how they could behave in a manner that would end the need for restraint;
- always look to use the least intrusive method of intervention;
- remain calm and manage any verbal abuse professionally.

Pupils should not be restrained on the floor. Where a pupil drops to the ground they are to be held until it is safe to release and then, where safe to do so, monitored as they get back onto their feet. If it is not necessary to hold them, then staff should not.

If restraint is required for an extended period (for example, more than five minutes), a senior member of staff must monitor the situation closely with a view to safeguarding the child and the staff concerned.

After the incident, it is vital that a full report is completed by all concerned (see Incident Reporting and Recording Form below) and the agreed de-briefing procedures adhered to in order to support the child, the members of staff involved, the parents, any other children involved and in line with our Safeguarding Policy.

In the event of an incident when physical restraint is required, an incident form will be completed within 24 hours. If possible, all staff and children involved will undertake a de-briefing meeting with the Headteacher within 24 hours. The parents/carers should meet with the Headteacher as soon after the incident as possible. Copies of the form will be kept by the Academy and sent to all concerned in the incident including parents. If an injury has been incurred to anyone involved, the usual procedures regarding this will be followed.

In the event of physical restraint being necessary on more than one occasion to manage the behaviour of an individual, it would be appropriate to include safer handling advice in any plan regarding the child. It is also necessary to compile an individual risk assessment in discussion with all staff, parents and any relevant outside agencies. In the case of a child with an Education, Health and Care Plan, there will be opportunities to address issues of challenging behaviour at annual review meetings and an interim review organised in exceptional circumstances. Looked-After Children will have a Personal Education Plan which features planning and strategies to address challenging behaviour, where appropriate.

The Headteacher, Senior Leadership Team and Governors need to ensure that all authorised teachers and other authorised staff are appropriately trained and updated by Positive Behaviour Team (Trust Approach) Safer Handling (Care & Control) Training provider and accept the responsibility of their role by being aware of the guidelines in this policy. Records are to be kept of any physical restraint or incident involving physical contact. These are to be clear, comprehensive and prompt (completed within 24 hours of incident). Parents must be informed and consulted each time a form is completed. These records will be part of an ongoing annual review procedure that examines practice and informs future planning. The bound books are a legal document of the restraint used and must be kept securely

The Headteacher, Senior Leadership Team and Governors need to ensure that, as far as possible, preparation and planning has taken place to identify areas where physical restraint might be used. However, the school may also have to intervene in circumstances where preparation and planning have not been possible. When physical restraint takes place, the school will always endeavour to protect children and adults from physical harm, however there may be cases in which some discomfort and/or bruising may occur, to both staff and children, as a result of the restraint taking place. If, after receiving the report of an incident where physical intervention has occurred, the Headteacher considers the Academy's guidelines have been seriously breached and that further investigation is warranted, the incident should not be pursued, but action in accordance with Child Protection procedures must be taken. In these circumstances, any school internal investigations must cease and no further statements should be taken. If the Academy's guidelines have been breached, the Headteacher will contact the LA Personnel Division and advise the staff member to consult his/her professional association. Where necessary the Safer Handling trainer Positive Behaviour Team (sue.positivebehaviourteam@hotmail.co.uk) or local police should be informed of the circumstances as an impartial and competent professional's view on the force used would be preferential prior to taking action such as suspending the member of staff, as per the Employment Rights Act 1996, which makes it an offence to discipline or dismiss: "Members of staff should not be disciplined or dismissed for taking action to defend themselves or others in circumstances of serious or imminent danger.

Risk Assessment for the Use of Restraint

The use of restraint would only be acceptable when the child is at serious risk of injuring themselves or other children.

Risk	**Control Measures**	**Staff/Children affected**
Risk of injury to adult	Restraint used only as a last resort. Safer Handling techniques used by trained personnel.	The individual adult
Risk of injury to child	Restraint used only as a last resort. Safer Handling techniques used by trained personnel.	The individual child
Risk of further injury to an existing staff medical condition	Any existing staff medical conditions must be disclosed to the Headteacher and advice taken as to whether the use of restraint in any circumstances is viable.	The individual adult
Risk of distress to other children	Whenever possible, other pupils should be taken to another location or the child being restrained removed to a place of safety.	All
Risk of complaint from parent	Always call for assistance. Wherever possible, at least two adults should be present.	Trained staff
Risk of repeated incidents	In certain circumstances, a place/room of safety will be created and used where there is a risk of repeated/regular occurrences.	Individual pupils at significant risk

Incident Reporting and Recording Form

Serious Incident Record Form	
Name of School:	**Incident number:**
Name Of Young Person:	
Location of Incident:	**Date:**
Full Names of Staff Involved:	

Start Time of Serious Incident:	**Duration of Any Restraint:**	**Any Injuries:**	**Medical Check:**	**Incident Reviewed With Young Person:**
	Mins:	Child Other	Offered Accepted	Offered Accepted

Nature Of Risk:	**External Agencies Informed:**	**Supporting Records Completed:**
Injury To Person	Medical Staff	Accident Report
Damage To Property	Parent/Guardian	Medical Report
Criminal Offence	Social Worker	Formal Statement
Serious Disruption	Placing Authority	Other Please State:
Absconding	Police	
Other Please State:	Other Please State:	

Environments and Triggers:

Describe what was happening and what led up to a dangerous situation:

Circle the level of potential risk:

Low Medium

High Circle and/or describe

precisely what the risk was:

Verbal abuse Slap Punch Bite Pinch Spit Kick

Hair Grab Neck grab Clothing grab Body holds Arm grab

Weapons/Missiles Other Please State:

Who was at risk?

Controlling Risk

Describe any changes you made to routines, personnel or the environment in an attempt to reduce the risk of this happening:

Diversion, Distractions and De-escalation Attempted (please

circle/highlight): Verbal advice and support Firm clear directions
Limited Choices Distraction
Negotiation
Diversion Reassurance Planned ignoring
Contingent
Touch Calm Talking/Stance Time Out Withdrawal Offered
Withdrawal Directed Transfer Adult
Reminders about Consequences Humour Success

Reminders Other Please State:

Physical Intervention Strategies Attempted:

How Was Restraint Ended:

Young Persons Comments Throughout:

Outcome of Debrief and Strategies Implemented For Preventing Re-occurrence:

Any Further Comments/Incidents During Restraint

Signed: **Date:**

Report Completed By:

Headteacher Comments: **Signed:** **Date:**

Name of person completing the risk assessment and role					Type of RA Initial/review)		
Pupil (s) subject to the risk assessment					Date of this assessment		
Risks	Who might be harmed and how?	What safety measures are in place?	What further measures are now needed to enhance safety?	Who will do this?	By When?	Review updates	
Risk assessment shared with (including any external agencies):							

Signed by Headteacher: Date: Signed by Parent: Date:
Signed by DSL: Date: Signed by Pupil: Date:

Date of next review:

A copy of all risk assessments must be uploaded to CPOMS

Annex 16 Risk Assessment for Volunteers

This risk assessment should be completed for any volunteer who is not clearly in regulated activity when deciding what checks, if any, are required. From 1 September 2026, because the supervision exemption has been removed, any volunteer who teaches, trains, instructs, cares for or supervises children frequently, on more than three days in a 30-day period, or overnight is in regulated activity and requires an enhanced DBS check with children's barred list information.

Name of Volunteer:

Is the volunteer in regulated activity because they will teach, train, instruct, care for or supervise children frequently, on more than three days in a 30-day period, or overnight?

Yes	Enhanced DBS with children's barred list information is required. Existing volunteers who become regulated activity from 1 September 2026 must have their children's barred list status checked.
No	If the role is not regulated activity, complete the risk assessment below to decide whether an enhanced DBS check without barred list information, a basic DBS check, or no DBS check is proportionate.

Areas to consider

In what capacity will the volunteer be working with pupils?

What is the age group of the pupils that the volunteer will work with?

Are these pupils regarded as particularly vulnerable?

How frequently will the volunteer be in school?

Has the volunteer's identity been verified?

What relevant information does the school already know about the volunteer and what is the connection of the volunteer to the school?

Is the volunteer in paid employment or working in a voluntary capacity elsewhere with children?

Can the volunteer provide at least one reference from someone other than a family member?

Is the volunteer or school aware of any reason why they should not volunteer to work with children?

Decision

Is an application for a DBS check required? An enhanced DBS check with children's barred list information must be undertaken where the volunteer is in regulated activity. An enhanced DBS check without barred list information or a basic DBS check may be appropriate where the volunteer is not in regulated activity.

Yes/ No : Reason for this:

Headteacher: _____ Date: _____

Annex 17 Visiting Speakers Vetting Procedure

The Academy is part of a wider community. Occasionally we have speakers/performers from this community who enrich our pupils' experience of school, providing pupils with information that helps them to make decisions at different phases of their education, widening their understanding of world and global issues and providing motivational inspiration through the sharing of a speaker's/performer's experience. Our responsibility to our pupils is to ensure that they can

critically assess the information they receive as to its value to themselves and that the information is aligned to the values of the school. We achieve this through the following protocols:

All requests for outside speakers/performers must be discussed with the College Leader/Head of School and a Visiting Speaker/Performer Form completed (see below). To complete this form the staff member organising the event must provide:

- a brief biography of the speaker/performer or institution with the purpose clearly defined as to the information the speaker/performer wishes to communicate. The information must align to the values of the Academy. This must be discussed with the organiser prior to the request being made and the Visiting Speaker/Performer Form being completed;
- a named 'link contact' for the speaker/performer who will be the liaison with school;
- the staff member responsible for arranging the visit must ascertain that all information communicated by the speaker/performer is lawful.

On receipt of the form the DSL or Headteacher will make a decision regarding permission for the speaker/performer to come to the Academy. Please note that, whenever possible, a period of no less than one month's notice should be given prior to the speaker/performer's proposed visit to the school. For secondary schools, once agreed, the form will be forwarded to the Headteacher for final authorisation.

Please note: the staff member must send or give the speaker/performer a copy of the Visiting Speaker/Performer Agreement in advance of the visit (see below); this is to ensure the speaker/performer is able to prepare in advance of their visit regarding our values and will be familiar with the declaration before being required to sign it on arrival at school.

Further guidelines

Academy safeguarding procedures apply and the visiting speaker/performer will be asked for evidence of identity. Unless DBS status has been verified as clear prior to the visit, the speaker/performer will not be allowed unsupervised access to the school site. A member of school staff will therefore accompany the speaker/performer at all times.

Speakers/performers will be issued with further safeguarding information on arrival at Reception to ensure they are familiar with the safeguarding arrangements within the Academy. They will be issued with a visitor's lanyard which they must wear at all times.

During the speech/performance - monitoring

A member of staff must be present during the event to monitor the speech/performance. In the unlikely event that the speech/performance does not meet the requirements of an educational setting, immediate action will be taken by the member of staff to balance the information given and to stop the performance in extreme circumstances.

Visiting Speaker/Performer Form

Date of Event

Time of Event

Purpose of speech/ performance (including year groups involved)

Name of speaker/performer and organisation
How did you become aware of this visitor?

Brief biography of speaker/performer/ organisation (continue on additional page if necessary)

Confirm that research (e.g.: internet search) has been carried out on the speaker/event, and the organisation they are affiliated to – record detail

Name of link person to liaise with school

Contact details for link person

Shires staff member responsible for visit

Venue/Room

Authorisation SLT/Headteacher I: Having assessed the level of risk I am satisfied that this speaker/visit is suitable and that the planned event can go ahead. **OR** **Having completed this risk assessment I have reflected on the evidence, and made the decision that this visit MUST NOT go ahead. (SLT/Headteacher to take appropriate action)**	……. (sign and date) Event MUST NOT go ahead and has been cancelled by the SLT/Headteacher ……. (sign and date)
Confirm that you agree to ensure that the speaker is accompanied at all times, whilst on the premises	YES NO

If speaker/performer will be <u>unaccompanied at any time</u> or if they are likely to visit again in the future please supply the following details:

DBS

Position/job disclosure covers:

Name of Employer:

Name of Registered Body:

Date of DBS Certificate:

This is to confirm that all information communicated by the speaker/performer is lawful and will not undermine the values and ethos of the school.

Signed by Headteacher: **Date:**

Post visit feedback:

Visiting Speaker/Performer Agreement

We understand the importance of visitors and external agencies to enrich the experiences of our pupils.

In order to safeguard our children we expect all visiting speakers to read and adhere to the statements below.

- any messages communicated to pupils support fundamental British Values and our school values;
- any messages communicated to pupils are consistent with the ethos of the school and do not marginalise any communities, groups or individuals;
- any messages communicated to pupils do not seek to glorify criminal activity or violent extremism or seek to radicalise pupils through extreme or narrow views of faith, religion or culture or other ideologies;
- activities are properly embedded in the curriculum and clearly mapped to schemes of work to avoid contradictory messages or duplication;
- activities are matched to the needs of pupils;
- visitors will also be accompanied by a member of staff at all times.

Signed:..... Date: .....

Annex 18 Children who are lesbian, gay, bisexual, or gender questioning.

Annex 18 update: Schools must provide a safe, respectful and inclusive environment for all children. Children who are lesbian, gay or bisexual, and children questioning their gender, may be more vulnerable to bullying, harassment, discrimination, mental-health difficulties and safeguarding harm. Staff must listen to the child, consider individual circumstances and safeguard welfare without making assumptions.

Support for a child questioning their gender must be individualised, child-centred, evidence-informed and carefully recorded. The DSL must consider the child's wishes and feelings, safety, wellbeing, SEND and mental-health needs, family context, risks of harm and duties under the Equality Act 2010 and Human Rights Act 1998. Parents/carers should normally be involved unless doing so may place the child at risk of significant harm or is otherwise unsafe. Appropriate safeguarding, legal or clinical advice must be sought where required.

The school is committed to providing a safe, respectful and inclusive environment for all children. Any support provided to a child questioning their gender will be individualised, child-centred, evidence-informed and focused on safeguarding and promoting the child's welfare.

Children will be encouraged to speak with a trusted adult. Trusted adults may include the **Designated Safeguarding Lead, Deputy Designated Safeguarding Leads, SENDCo, Mental Health Lead, class teacher or another member of staff identified by the child**.

The **Designated Safeguarding Lead (DSL)** will oversee decision-making, record keeping and safeguarding arrangements. Discussions, concerns, decisions, actions and rationales will be recorded and monitored through **CPOMS**.

Parents and carers will normally be involved in discussions and decision-making relating to their child. However, information may be withheld from parents where there is reason to believe that doing so would place the child at risk of significant harm or otherwise compromise their safety and wellbeing.

The DSL will undertake and regularly review risk assessments where concerns relating to safeguarding, wellbeing, bullying, harassment, discrimination, mental health or vulnerability are identified. Risk assessments will be proportionate to the individual circumstances of the child and will be updated as circumstances change.

Where appropriate, the school will seek advice and support from external agencies and professionals. This may include Children's Social Care, the Family Front Door, the Local Authority, health professionals, mental health services, educational psychologists, SEND services, the Local Authority Designated Officer (LADO) or other relevant safeguarding professionals.

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.

It recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.

As such, when supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. Schools should refer to our Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed. (Link to be included once published)

Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

Annex 19. Absconding or Missing Pupils Procedure

Purpose

This document outlines the procedures to follow when a pupil is identified as missing from school and cannot be accounted for, despite present during registration. This is to ensure the safety and well-being of all pupils in our care.

Scope

These procedures apply to all staff, pupils, and parents/guardians and cover situations where a pupil is unaccounted for during school hours, trips, or while arriving to or departing from school.

1. Roles and Responsibilities

Staff

- Maintain accurate attendance records and be vigilant during the school day.
- Follow procedures outlined if a pupil is reported or found to be missing.

Parents/Guardians

- Inform the school promptly if their child is absent, providing reasons for non-attendance.
- Respond promptly to any school alert regarding their child's wellbeing.
- Inform the school if their child has arrived to school dysregulated.
- Provide up-to-date emergency contact information.

Senior Leadership Team (SLT)

- Oversee the implementation of this procedure.
- Coordinate actions in response to a missing pupil.
- Liaise with parents/guardians, external agencies, and authorities as necessary.
- Share this procedure with the relevant stakeholders.

2. Definition of a Missing Pupil

A pupil is considered missing if they:

- Are absent without explanation from scheduled lessons or activities.
- Have left school premises without authorization.
- Fail to arrive at school without prior notification of absence.
- Fail to arrive at the planned meeting point/home at the end of the school day.

3. Procedures

3.1 During School Hours

1. **Immediate Check:**

- Staff noticing a missing pupil should conduct an initial search of the immediate area, including classrooms, toilets, playgrounds and outdoor areas.
- Check with the school office whether the child has been collected.

2. **Inform Leadership:**

- If the pupil is not found following the immediate check, notify a senior leader and a

3. **Wider Search:**

- Conduct a wider search of the extended school premises (such as the car park, service road, field, sensory garden etc.) and areas outside of the premises within close proximity (such as School Lane).

4. **Contact Parents:**

- Notify the parents/guardians to inform them that their child is missing.

5. **Contact Authorities:**

- If the pupil remains missing after searching, contact the police and provide details of the situation, including the pupil's description, last known location, and any relevant information.

6. Wider search (continued):

- Continue with the search considering the individual pupil and their predicted routes. Involve additional staff members who maintain regular communication with each other and the school office via school radios and/or personal mobile phones.

7. If found:

- Consider individual child's needs and keep them safe if found. Depending on the situation and the individual, this may involve any of the following: encouraging them to return to school, returning to school on foot with the child, staying with them to ensure their safety while waiting for the parent/guardian, communicating with the parent/guardian where appropriate.

- Inform the school office and relevant individuals supporting with the search that the child has been found.
- School office contacts the parents/guardians to inform them that the child has been found.

8. **Contact Authorities again:**

- If the pupil remains missing after wider searching, contact local authorities (e.g., the police) and provide additional details of the situation, including the pupil's description, last known location, and any relevant information.

9. **Record Keeping:**

- Document all actions taken on CPOMS, including times and personnel involved.

3.2 When a child is seen absconding from site:

1. Alert closest members of staff verbally or via radio and arrange for a member of SLT and office staff to be alerted verbally or via radio, giving details of location of child's departure from site.
2. Immediately take action to keep sight of the child - open gates using nearest key, emergency key is always available at nearest classroom to playground.
3. Office staff make use of CCTV footage to identify location of child if still nearby school premises
4. If child is in close enough proximity, make efforts to encourage the child to return to the school site using appropriate strategies to meet individual needs.
5. Additional staff ensure mobile phone/radios are available to ensure continued contact. Additional staff may also be deployed to maintain contact on foot or in a vehicle.
6. Office staff maintain contact with staff offsite and SLT and follow SLT's guidance to contact police and parents as appropriate.
7. If a child is deemed to be a potential danger to himself or others, follow guidance around use of positive handling to support the return of the child to a safe space.
8. Follow the child at a distance and make every effort to remain in visual contact. Staff make judgement around time to attempt to engage child and encourage return to school.
9. Keep in contact with the school office and SLT via radio/mobile phone
10. If sight of the child is lost, follow procedure from 3.1.4

Following the safe return of the child, the Senior Leadership Team (SLT) will assess the situation and determine the most appropriate course of action based on the individual circumstances. Their decision will be guided by the school's behaviour policy and their understanding of the specific child.

3.2 Off-Site Activities

1. **Headcount and Supervision:**

- Conduct regular headcounts to ensure all pupils are accounted for during trips.
- If a pupil is identified as missing, inform the trip leader immediately.

2. **Search and Notification:**

- Follow the same steps as outlined in Section 3.1, adapting to the location's circumstances.

3. **Emergency Services:**

- If the pupil cannot be located within 20 minutes, notify local police and the school.
- SLT within school make decision regarding contacting parents and further search arrangements.

3.3 Failure to Arrive at School

1. **Attendance Check:**

- If a pupil is absent without prior notification, attempt to contact parents/guardians immediately.

2. **Follow-Up:**

- If no response is received and concerns arise about the pupil's safety, escalate to DSL and plan a home visit. Referral may be made to Worcestershire Safeguarding team.

4. Preventative Measures

- Maintain up-to-date pupil information, including emergency contacts and medical details.
- Regularly review site security as part of health and safety measures.
- Regularly review and reinforce school boundaries and supervision protocols.
- Educate pupils on staying within designated areas and the importance of informing staff if they need to leave.

Annex 20 Alternative provision

Where the school commissions alternative provision, it remains responsible for safeguarding the pupil. It will complete due diligence, obtain written confirmation of appropriate safeguarding checks, require the provider to notify it of staff changes or any arrangements that may place the child at risk, and maintain accurate records of the address of the principal provider, any subcontracted provision and every satellite site the pupil may attend. The school will review attendance, safety, suitability and whether the placement continues to meet the pupil's needs at least half-termly. Any safeguarding concern will trigger an immediate review and, where necessary, suspension or termination of the placement unless or until the concern has been satisfactorily addressed.
The school will have regard to DfE alternative provision guidance and voluntary national standards, but will not rely solely on any local register or approval process.

Annex 21 Safeguarding children with medical conditions

An incident involving the management of a medical condition, including an allergy, does not automatically require a safeguarding referral. A referral will be considered where the incident indicates increased risk of neglect, abuse or exploitation, for example where essential medical information is withheld or a child is repeatedly sent to school without essential medication, placing them at risk. The school will follow statutory guidance on supporting pupils with medical conditions and allergy safety.

Annex 22 Mobile phone policy

Within school our default position is that pupils will not have access to mobile phones throughout the school day, including lessons, movement between lessons, breaktimes and lunchtime. Any justifiable exceptions are risk assessed and set out in the school's Mobile Phone Policy.

Annex 23 Temporary accommodation notification duty

Where the school becomes aware that a child has been placed in temporary accommodation outside the local authority area, it will share relevant safeguarding information promptly and work with the responsible local authorities and other agencies in accordance with the applicable notification duties and local arrangements. The DSL will consider the impact of temporary accommodation on attendance, access to services, welfare and safeguarding risk.