

# Child protection and safeguarding policy

St Stephen's CofE First School



|                     |                              |                                    |
|---------------------|------------------------------|------------------------------------|
| Approved by:        | Vicky Jackman                | Date: 20 <sup>th</sup> August 2026 |
| Last reviewed on:   | 20 <sup>th</sup> August 2026 |                                    |
| Next review due by: | August 2027                  |                                    |

## **Central Region Schools Trust Safeguarding and Child Protection Policy Statement**

The Central Region Schools Trust and all of its schools fully recognises its responsibilities for safeguarding children and young people. We are committed to safeguarding and promoting the welfare of all pupils by protecting children from maltreatment; preventing the impairment or development of mental and physical health and by ensuring that children are growing up in circumstances consistent with the provision of safe and effective care. This is in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002; and in line with latest version of government publications; "Working Together to Safeguard Children" and "Keeping Children Safe in Education".

The Central Region Schools Trust is committed to meeting its moral and statutory responsibility, ensuring that robust procedures are in place, outlining the actions that it will take to prevent harm, to promote wellbeing, to create safe environments and to respond to specific issues and vulnerabilities. Safeguarding determines the actions taken to keep children safe and protect them from harm in all aspects of their school life to ensure they have the best outcomes. This is underpinned by a culture of openness where both children and adults feel secure, able to talk, and believe that they are being listened to.

The Central Region Schools Trust maintains an attitude of 'it could happen here' and expects that all staff, visitors and volunteers share and demonstrate their commitment to protecting children. In addition to the 'central register', all schools are required to maintain a single central record to provide reassurance that all staff and volunteers are recruited safely.

The Central Region Schools Trust is committed to the following safeguarding key principles:

- Responsibility to safeguard and promote the welfare of children is of paramount importance
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection
- All staff, volunteers, Local Academy Governing Body/Board (LAGB) Members and Trustees must share this commitment
- All staff, volunteers, LAGB Members and Trustees have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm at home, in the community or at school
- When concerned about the welfare of a child, staff members are to always act in the interests of the child
- Where there is a safeguarding concern, schools will ensure, where reasonable and appropriate, that the child's wishes and feelings are taken into account. Children will be clear about the ways they can report abuse and that their concerns will always be taken seriously
- We commit to a whole school approach to safeguarding
- Students and staff involved in child protection issues will receive appropriate training and support

The Central Region Schools Trust expects that each school will follow the West Midlands Safeguarding procedures and adhere to guidance provided by Local Authority Children's Services departments. Crucially, there may be safeguarding issues that are specific to their local area and communities.

This policy outlining the local procedures for each of the schools across the Trust will be made available on the school websites. They have been developed to ensure compliance with legislation including Section 175 the Education Act 2002, Section 11 of the Children's Act 2004, Working Together to Safeguard Children and Keeping Children Safe in Education. All schools are expected to follow the escalation policy if they have concerns about the management of a case by Children's Social Care.

The Child Protection and Safeguarding policy works in conjunction with other relevant policies in place at both Trust and at a local level, safeguarding the interests and welfare of children e.g. recruitment and selection, anti-bullying, confidential reporting (Whistleblowing), health and safety, special education needs and disabilities, equality policy and staff code of conduct.

The Central Region Schools Trust has the following roles and responsibilities in place to ensure that all Academies are compliant and have a strong safeguarding culture:

| Roles                             | Responsibilities                                                                                                                                                                                                                          |
|-----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Safeguarding Trustee (ST)         | A Trust Board member who has an oversight of Trust-wide safeguarding and reports directly to the Board.                                                                                                                                   |
| Executive Safeguarding Lead (ESL) | A member of the executive team who has an oversight of Trust-wide safeguarding and leads on the development of the CRST safeguarding policy.                                                                                              |
| CRST Director of Safeguarding     | A lead DSL who takes responsibility for peer audits, the DSL peer network and who liaises closely with the ST and ESL.                                                                                                                    |
| LAGB Safeguarding Link            | A member of the LAGB who has an oversight of safeguarding in their individual school and reports back to the LAGB. They also have the Safeguarding Trustee as point of contact to the Trust Board                                         |
| Designated Safeguarding Lead/s    | Member/s of staff responsible for safeguarding and child protection within their individual school. They liaise closely with key stakeholders, such as their staff, Principal, Safeguarding Link Governor and relevant external agencies. |

Our policy applies to all staff (teaching and non-teaching) including those from the executive and central team, peripatetic, supply staff, contract staff and third-party contractors, members, trustees, governors, volunteers and visitors in the Trust.

### **Trust Safeguarding Culture**

- Safeguarding is not a process or a policy. It is a culture.
- At St Stephen's CofE First School every adult has a responsibility to safeguard and promote the welfare of children.
- The school maintains an attitude of "it could happen here" and places the voice, safety and wellbeing of the child at the centre of all decision-making.
- Where there is a safeguarding concern, the child's wishes, feelings, safety and best interests will be paramount.

## Governance

The Central Region Schools Trust maintains clear governance arrangements for safeguarding across all schools.

The Trust Safeguarding Trustee provides Trust-wide oversight of safeguarding and receives assurance regarding safeguarding practice, compliance and risk across all schools.

At St Stephen's CofE First School, the Local Academy Governing Board (LAGB) provides strategic oversight and challenge in relation to safeguarding and child protection. The LAGB receives regular safeguarding reports and seeks assurance that safeguarding arrangements are effective and that statutory duties are being met.

The LAGB has appointed a Safeguarding Link Governor who meets regularly with the Designated Safeguarding Lead (DSL) to monitor safeguarding arrangements, review priorities, discuss emerging risks and provide appropriate challenge and support.

Safeguarding is a standing agenda item at full LAGB meetings.

| Focus                                                   | Process                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|---------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Quality Assurance                                       | <p>Each School has an external review of safeguarding practice once every two years. This is carried out by an expert safeguarding consultant.</p> <p>One Term after the review the CRST Safeguarding Lead will carry out a review of the action plan instigated as a result of the review.</p> <p>One year after the review, a peer review of safeguarding practice will be conducted by DSLs from across the Trust.</p> <p>If serious concerns are raised in peer audits or external checks, they will be shared immediately with the Executive Lead for Safeguarding who will inform the Safeguarding Trustee and the Executive Leadership Team.</p> |
| Strategic oversight and connection with the Trust Board | <p>The Safeguarding Trustee meets with the Executive Leader for Safeguarding and the CRST Safeguarding Lead on a termly basis to evaluate findings from audits and checks and to monitor LAGB meeting minutes. Findings will be reported back to the full Board.</p>                                                                                                                                                                                                                                                                                                                                                                                    |
| LAGBs                                                   | <p>LAGB Safeguarding Link Governors meets with DSL in school on a termly basis and/or is part of the audits/checks. LAGB Safeguarding Link can contact the Safeguarding Trustee if they have concerns in relation to safeguarding in their individual school. Safeguarding a standing agenda item to be discussed at each LAGB meeting.</p>                                                                                                                                                                                                                                                                                                             |
| Peer support and collaboration                          | <p>Half-termly meetings led by the CRST Safeguarding Lead for School DSLs</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Other duties (including statutory)                      | <p>The Central Region Schools Trust Safeguarding &amp; Child Protection policy is reviewed and updated annually or as and when required.</p> <p>The Central Region Schools Trust OSCR protocols are in place, and reviewed as and when required, to ensure compliance in this area.</p>                                                                                                                                                                                                                                                                                                                                                                 |

The DSLs across the Central Region Schools Trust meet and network on a half-termly basis, to pool expertise, knowledge and experience in the development and application of policies and

procedures, to share good practice and to develop and embed best practice. This ensures that the core competences on child protection and safeguarding matters are being fully utilised, the DSLs network supports the development and growth of a centre of excellence on safeguarding matters across the Trust.

## Policy Review

The Safeguarding and Child Protection Policy will be reviewed and agreed as a minimum on an annual basis. This may be more frequent if national guidance requires ensuring that key statutory requirements are incorporated.

## Local Arrangements

The following section contains local arrangements and procedures for Safeguarding and Child Protection.

|                                              |                                          |
|----------------------------------------------|------------------------------------------|
| Chief Executive Officer (CEO)                | Guy Shears                               |
| CRST Safeguarding Trustee                    | Eric Griffiths                           |
| CRST Executive Leader for Safeguarding       | Ian Mellor                               |
| CRST Safeguarding Lead                       | Scott Crane                              |
| Designated Safeguarding Lead                 | Sarah Barrett                            |
| Principal                                    | Sarah Callanan                           |
| Chair of LAGB Board                          | Vicky Jackman                            |
| Safeguarding Link Governor                   | Gail Stone                               |
| Deputy DSL(s)                                | Sarah Callanan / Sophie Basche           |
| Single Point of Contact (SPOC)               | Sarah Callanan                           |
| Designated Teacher for Looked after Children | Sarah Barrett                            |
| Online Safety Lead                           | Lauren Cullen                            |
| Local Authority Designated Officer (LADO)    | Sue Taylor (admin support) 01905 846221  |
| Safeguarding in Education Advisor            | Denise Hannibal                          |
| Channel Panel Chair                          | West Mercia/West Midlands: Paul Kinsella |
| Children's Social Care                       | Family Front Door                        |

### St Stephen's CofE school – Statement of Context

Analysis of referrals made to the safeguarding team show that the most common areas of concerns raised are around:

- Domestic Abuse
- Neglect
- Parent Mental Health

Statistics show that that the most common crimes in the local area are:

- Violent Crime
- Anti-Social Behaviour

- Public Disorder

Source [www.crime-statistics.co.uk](http://www.crime-statistics.co.uk) (June 2026)

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## 1. Aims

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

## 2. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2023), and the Maintained schools: governance guide. We comply with this guidance and the arrangements agreed and published by our 3 local **safeguarding partners** (see section 3).

This policy is also based on the following legislation:

- 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 (as amended by the Protection of Freedoms Act 2012 and The Crime and Policing Act 2026), which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). This means our governors and Principal should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting a specific group of pupils (where we can show it's proportionate). This includes a duty to make reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be

more at risk of harm from issues such as: sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination

- Operation Encompass statutory guidance, which explains that the police must notify our school of any incidents involving domestic abuse
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the '2018 Childcare Disqualification Regulations') and Childcare Act 2006, which set out who is disqualified from working with children
- This policy also meets the requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage

### 3. Definitions

- **Safeguarding and promoting the welfare of children means:**
- 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 impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

**Child protection** is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

**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 of nudes or semi-nudes** is where children share nude or semi-nude images, such as photographs, videos or live streams. This also includes images that are digitally altered or wholly AI-generated (sometimes called 'deepfakes' or 'deep nudes') that otherwise appear to be a photograph or video. The sharing of nude or semi-nude images requires a safeguarding response whether they are consensual or non-consensual.

**Children** includes everyone under the age of 18.

The following 3 **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 known as clinical commissioning groups) for an area within the LA
- The chief officer of police for an 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) 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.

#### 4. Equality statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs and disabilities (SEND) or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 14)
- Are missing or absent from education for prolonged periods and/or frequently
- Whose parent/carer has expressed an intention to remove them from school to be home educated

#### 5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
  - Healthy and respectful relationships
  - Boundaries and consent
  - Stereotyping, prejudice and equality
  - Body confidence and self-esteem
  - How to recognise an abusive relationship (including coercive and controlling behaviour)

- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
- What constitutes sexual harassment and sexual violence and why they're always unacceptable

## 5.1 All staff

All staff will:

- Read and understand at least part 1 of the Department for Education's statutory safeguarding guidance Keeping Children Safe in Education (KCSIE) in full, and review this guidance at least annually
- Complete a declaration at the beginning of each academic year to say that they have read and reviewed the guidance
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (for example, sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

- Our systems that support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and any deputies, the behaviour policy, online safety that includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring, and the safeguarding response to children who go missing from education/who are absent from education.
- Be aware of the school's unauthorised absence procedures and children missing education procedures
- The early help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- The process for community-based Family Help assessments
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect, exploitation and modern slavery, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The safeguarding issues that often overlap and can put children at risk of harm, including:
  - Drug taking and/or alcohol misuse
  - Unexplainable and/or persistent absences from education
  - Serious violence, criminal exploitation (including that linked to county lines), radicalisation
  - Consensual and non-consensual making or sharing of nudes or semi-nudes

- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that mental health can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
- That children who are (or who are perceived to be) lesbian, gay or bisexual can be vulnerable to discriminatory bullying
- The potential vulnerabilities of children who are questioning their gender
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

Appendix 2 of this policy outlines in more detail how staff are supported to do this.

### **5.1a Professional Curiosity**

- All staff are expected to demonstrate professional curiosity.
- Staff should respectfully question and explore circumstances that appear unusual, inconsistent or concerning. Staff should not accept explanations at face value where safeguarding concerns exist.
- The absence of a disclosure does not mean the absence of risk.
- Staff should maintain an attitude of "what if?" and seek further advice from the DSL whenever concerns remain.

### **5.2 The Designated Safeguarding Lead (DSL)**

The Designated Safeguarding Lead (DSL) is a member of the Senior Leadership Team and has overall responsibility for child protection and safeguarding within the school.

Our DSL is Sarah Barrett.

The DSL takes lead responsibility for all safeguarding and child protection matters, including online safety and oversight of the school's filtering and monitoring systems to help ensure pupils remain safe when using school devices and networks.

During term time, the DSL or a Deputy DSL will be available during school hours for staff to discuss safeguarding concerns.

Contact details:

Sarah Barrett (DSL)

Tel: 01527 63911

Email: sbarrett@ststephens.crst.org.uk

In the absence of the DSL, safeguarding responsibilities will be undertaken by:

- Sarah Callanan (Deputy DSL) – scallanan@crst.org.uk
- Sophie Basche (Deputy DSL) – sbasche@ststephens.org.uk

The school will ensure that a trained DSL or Deputy DSL is available at all times during school hours to provide safeguarding leadership and support.

The DSL and Deputy DSLs will be provided with appropriate time, funding, training, resources and support to enable them to:

- Provide advice, guidance and support to staff on child welfare and child protection matters.
- Take part in strategy discussions, inter-agency meetings and other multi-agency safeguarding arrangements, and support staff to contribute as required.
- Contribute to assessments of children where appropriate.
- Make referrals to relevant agencies, including Worcestershire Children's Social Care, the Channel Programme, the Disclosure and Barring Service (DBS) and the police, and support staff who make referrals directly.
- Maintain a secure understanding of harmful sexual behaviour and its impact on children and young people.
- Maintain an effective understanding of the school's filtering and monitoring systems and associated safeguarding processes.

Sarah Callanan, Deputy DSL, is the school's Prevent Lead.

The DSL will also:

- Keep the Principal informed of safeguarding concerns and developments as appropriate.
- Liaise with local authority case managers and designated officers regarding child protection concerns.
- Work with police and children's social care colleagues to understand and respond to local safeguarding issues, including sexual violence and sexual harassment.
- Ensure awareness of, and access to, local specialist services for all children involved in incidents of sexual violence or sexual harassment, including victims and alleged perpetrators.
- Ensure that children involved in police investigations or searches receive support from an appropriate adult where required.
- Ensure child protection records are accurate, secure and kept up to date.
- Ensure that child protection files are transferred securely and without delay when a child moves to another school.
- Maintain and monitor the school's Vulnerable Children Register.
- Oversee safeguarding attendance reviews and monitor attendance-related safeguarding risks.
- Quality assure safeguarding records and case management systems.
- Monitor repeat safeguarding concerns and identify emerging patterns of risk.
- Ensure safeguarding risk assessments are completed, reviewed and updated where required.
- Promote reflective practice and ensure lessons learned from safeguarding incidents are shared appropriately to strengthen safeguarding arrangements across the school.

The full responsibilities of the DSL and Deputy DSLs are detailed within their job descriptions.

### **5.2a Safeguarding Supervision**

The DSL and Deputy DSLs will have access to safeguarding supervision.

Supervision will provide:

- Professional challenge.
- Reflection on cases.
- Emotional support.
- Quality assurance.

### **5.3 The Local Academy Governing Board (LAGB)**

The Local Academy Governing Board is responsible for ensuring that appropriate safeguarding arrangements are in place and that effective oversight, challenge and accountability are provided.

The LAGB will:

- Ensure the school complies with its safeguarding and child protection duties.
- Provide strategic oversight of safeguarding arrangements.
- Hold the Principal and DSL to account for the implementation of safeguarding policies and procedures.
- Review and approve the Safeguarding and Child Protection Policy annually.
- Appoint a Safeguarding Link Governor.
- Receive regular safeguarding reports and monitor safeguarding effectiveness.
- Ensure that safeguarding is a standing item on governing board agendas.
- Ensure that appropriate filtering and monitoring systems are in place and reviewed annually.
- Ensure that safeguarding training is provided to governors and staff in line with statutory requirements.
- Seek assurance that safer recruitment procedures are being followed.
- Monitor the school's safeguarding culture and the effectiveness of safeguarding practice.
- Ensure that children's views, wishes and feelings are taken into account when safeguarding decisions are made.
- Ensure that the school fulfils its duties under Keeping Children Safe in Education and other relevant safeguarding legislation and guidance.

### **5.4 The Principal**

The Principal is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
  - Are informed of our systems that support safeguarding, including this policy, as part of their induction
  - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' or delegating a 'case manager' in the event of an allegation of abuse being made against another member of staff or volunteer, where appropriate.
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person
- Overseeing the safe use of technology, and devices like mobile phones and cameras in the setting

### **5.5 Virtual school heads**

Virtual school heads (VSHs) have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

VSHs also have a non-statutory responsibility to promote the educational achievement of children in kinship care (children who live with a relative or close family friend).

They should also identify and engage with key professionals, for example DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

## **6. Confidentiality**

Details of the role of our data protection officer can be found in the Trust's Data Protection Policy. All of our staff receive an annual refresher on the DfE's data protection guidance for schools.

At Central Region School's Trust we recognise that:

- Timely information-sharing is essential to effective safeguarding
- Arrangements should be in place setting out the processes and principles for sharing information within the school and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018, Data (Use and Access) Act 2025, and the UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe

- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
- There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
- The DSL should consider that:
  - Parents or carers should normally be informed (unless this would put the victim at greater risk)
  - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
  - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Regarding anonymity, all staff will:
  - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
  - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information (including personal information), and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

- Where a child leaves the school the DSL should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving
- Confidentiality is also addressed in this policy with respect to record-keeping in section 18.

## **7. Recognising abuse and taking action**

All staff are expected to be able to identify and recognise all forms of abuse, neglect, exploitation and modern slavery and shall be alert to the potential need for early help for a child who:

- Has a disability or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Has a mental health need
- Is a young carer
- Is pregnant and/or is a parent themselves
- Has exhibited early signs of abusive, violent and/or harmful behaviours
- Is bereaved
- Is showing early signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from education, care or home
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion and in alternative provision or a pupil referral unit
- Is at risk of exploitation, modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised into terrorism
- Has a parent or carer in custody, or is affected by parental offending
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean 'the DSL (or deputy DSL)'.

## **7.1 If a Child is Suffering, or is Likely to Suffer, Significant Harm**

The Designated Safeguarding Lead (DSL) team should be the first point of contact for all safeguarding concerns and enquiries within the school. Any member of staff, volunteer, or visitor who receives a disclosure of abuse, observes indicators of harm, or has concerns about a child's welfare must report these concerns immediately to the DSL. In the absence of the DSL, concerns must be reported to a Deputy DSL. If neither is available, the matter should be referred without delay to the most senior member of staff on site or directly to The Family Front Door.

All safeguarding concerns must be recorded promptly and accurately using CPOMS. Those without access to CPOMS must complete Form One (Appendix 3) and submit it to the DSL team as soon as possible. All subsequent actions, decisions and outcomes will be recorded within the school's safeguarding records.

Upon receiving a concern, the DSL will assess the information, determine the appropriate course of action and, where necessary, seek advice from or make a referral to The Family Front Door. All decisions, actions taken and the rationale for those decisions will be clearly documented.

Referrals will be made in accordance with local safeguarding procedures and the West Midlands Child Protection and Safeguarding Procedures.

Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, an immediate referral must be made to The Family Front Door. Any person can make a referral if they believe a child is at risk. If a member of staff feels that appropriate action has not been taken, or that a child's circumstances are not improving, they must continue to raise their concerns with the DSL and/or the Principal until they are satisfied that the child is receiving appropriate support and protection.

If a child is in immediate danger or requires urgent protection, staff must contact the police by dialling 999.

While staff should normally follow the reporting procedures outlined in this policy, they may make a direct referral to The Family Front Door or contact the police where:

- there is an immediate risk of harm and the DSL, Deputy DSLs and Principal are unavailable; or
- they believe that direct action is necessary to safeguard the child.

Any member of staff who feels that safeguarding concerns have not been addressed appropriately or in line with this policy should raise the matter with the Principal and/or the Executive Safeguarding Lead. If concerns remain unresolved, staff should contact The Family Front Door directly.

### **Safeguarding Attendance**

Attendance is recognised as an important safeguarding indicator. Persistent absence, unexplained absence, patterns of non-attendance, lateness, and concerns relating to children missing education will be considered as part of the school's safeguarding arrangements and may trigger further enquiry or intervention.

Detailed procedures relating to attendance monitoring, welfare checks, safeguarding attendance reviews and children missing education are set out in Appendix 2 of this policy and the CRST Attendance Policy.

## **7.2 If a child makes a disclosure to you**

If a child discloses a safeguarding issue to you, you should:

- › Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- › Stay calm and do not show that you are shocked or upset
- › Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- › Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- › Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- › Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- › Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- › Not recognise their experiences as harmful
- › Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

We will ensure that staff have sufficient understanding and use of English to ensure the well-being of children in their care. For example, to keep records in English, liaise with other agencies in English, be able to summon emergency help, and understand instructions, for example about the safety of medicines or food hygiene.

### **7.3 If you discover that FGM has taken place or a pupil is at risk of FGM**

Keeping Children Safe in Education (KCSIE) explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting' 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in Appendix 2 of this policy.

**Any teacher** who either:

- › Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- › Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

**Must** immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to, they should also discuss the case with the DSL and involve local authority children's social care as appropriate.

**Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

**Any member of staff** who suspects a pupil is at risk of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures.

#### **7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)**

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL or a deputy DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from Worcestershire County Council Family Front Door. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to The Family Front Door directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

#### **Early help assessment**

If an early help assessment is appropriate, the DSL (or deputy DSL) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the school will consider a referral to The Family Front Door if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

#### **Referral**

If it is appropriate to refer the case to local authority children's social care or the police, the DSL (or deputy DSL) will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority should make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

#### **7.5 If you have concerns about extremism**

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL (or a deputy DSL) and SPOC are not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from The Family Front Door. Make a referral to The Family Front Door directly, if

appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or [Channel](#), the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or The Family Front Door. team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

## **7.6 If you have a concern about mental health**

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

Mental health problems can also, in some cases, develop into safeguarding concerns (for example, self-harm).

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise, including:

- Significant changes in behaviour,
- Ongoing difficulty sleeping
- Withdrawing from social situations
- Not wanting to do things they usually like
- Physical signs of self-harm or neglecting themselves

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4. If you feel that a child is in danger, call 999 or arrange for the child to be taken to A&E immediately by their parent or other suitable person.

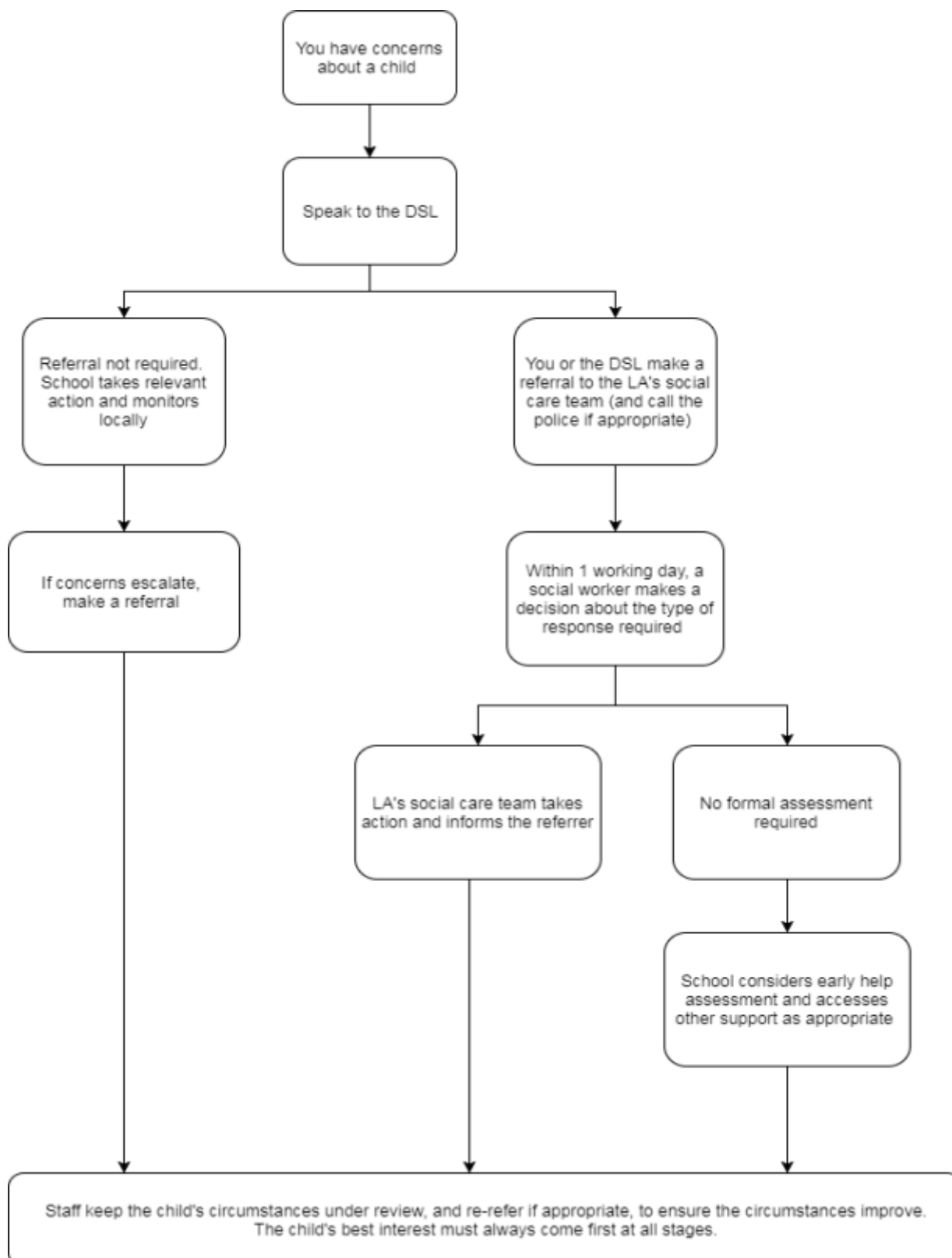
If the child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL (or deputy) to agree a course of action.

Refer to the Department for Education guidance on [mental health and behaviour in schools](#) for more information.

**Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)**

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



## **7.7 Concerns about a staff member, supply teacher, volunteer or contractor**

If you have concerns about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) posing a risk of harm to children, speak to the Principal as soon as possible. If the concerns/allegations are about the Principal, speak to the Chief Executive Officer by contacting them at the Assay Studios, Birmingham.

The Principal/CEO will then follow the procedures set out in the Central Region Schools Trust 'Managing Allegations' policy or 'Whistleblowing Policy' as appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) to the Principal, report it directly to the local authority designated officer (LADO).

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale.

## **7.8 Allegations of Abuse Made Against Other Pupils (Child-on-Child Abuse)**

All reports, concerns or allegations of child-on-child abuse will be taken seriously and managed as safeguarding concerns. The Designated Safeguarding Lead (DSL) will ensure that each incident is considered carefully and that an appropriate response is implemented to safeguard all children involved.

The school will:

- Consider the immediate safety and wellbeing of all children involved.
- Take appropriate action to protect those at risk of harm.
- Complete a safeguarding risk assessment where necessary.
- Consider whether a referral to Children's Social Care, the Police or other relevant agencies is required.
- Provide appropriate support for any child who has experienced harm.
- Provide support, education and intervention for any child displaying harmful behaviour.
- Monitor outcomes and review the effectiveness of support and intervention measures.

We recognise that children are capable of abusing their peers and that child-on-child abuse can occur both inside and outside of school, including online. Such abuse will never be dismissed as:

- "banter"
- "part of growing up"
- "just having a laugh"
- "boys being boys"

The school recognises that minimising or normalising harmful behaviours can contribute to an unsafe culture and may allow abuse, misogyny, misandry and harmful attitudes to go unchallenged.

Whilst any child can be both a victim or perpetrator of abuse, we acknowledge that some forms of child-on-child abuse are more likely to affect girls, while boys are statistically more likely to be identified as perpetrators. However, all allegations and concerns will be treated seriously, regardless of the gender of those involved.

Most incidents involving conflict between pupils will be managed through the school's Behaviour Policy. However, this Safeguarding and Child Protection Policy will apply where behaviour raises safeguarding concerns, including where the alleged behaviour:

- Is serious and may constitute a criminal offence.
- Poses a risk of significant harm to another child.
- Involves physical violence or intimidation.
- Involves coercion, exploitation or the misuse of drugs and alcohol.
- Involves sexual abuse, sexual violence, sexual harassment or exploitation.
- Includes indecent exposure, sexual assault, upskirting or unwanted sexualised behaviour.
- Involves the creation, possession or sharing of nude or semi-nude images, including AI-generated images.
- Is motivated by, or contributes to, misogyny, misandry, prejudice or discriminatory attitudes.

Further information can be found in Appendix 2: Child-on-Child Abuse.

### **Procedures for Managing Allegations of Child-on-Child Abuse**

Where a pupil discloses abuse by another pupil, or where concerns are raised:

- Staff must listen, reassure and record the concern accurately.
- Staff must report the concern immediately to the DSL or a Deputy DSL.
- Staff must not investigate the matter themselves.

The DSL (or Deputy DSL) will:

- Consider the nature of the concern and determine the most appropriate course of action.
- Seek advice from Worcestershire Children's Social Care via the Family Front Door where appropriate.
- Contact the Police if the allegation may involve a criminal offence.
- Undertake a safeguarding risk assessment and develop a support plan for all children involved, including victims, alleged perpetrators and affected pupils.
- Consider arrangements for transport, unstructured times and other contexts where pupils may come into contact.
- Ensure each child has access to a trusted adult and appropriate pastoral support.
- Involve CAMHS or other specialist services where this is considered necessary.

Where a criminal investigation is underway, the DSL will work closely with the Police and other relevant agencies to safeguard children whilst considering any necessary disciplinary action. The school will seek guidance from investigating agencies where required and ensure that safeguarding remains the primary consideration throughout.

### **Creating a Supportive Environment and Preventing Child-on-Child Abuse**

The school is committed to creating a culture where all pupils feel safe, respected and able to report concerns. We believe that prevention, education and early intervention are essential in reducing the risk of child-on-child abuse.

To achieve this, we will:

- Maintain a culture of respect and positive relationships.
- Challenge all forms of derogatory, prejudicial, sexualised or abusive language and behaviour.

- Address incidents promptly and consistently.
- Educate pupils about healthy relationships, respect, consent, boundaries and online safety through the curriculum.
- Ensure pupils know how to report concerns and access support.
- Take all disclosures seriously and reassure pupils that they will be listened to and supported.
- Remain alert to patterns of behaviour that may indicate wider cultural, environmental or systemic safeguarding concerns.
- Work with safeguarding partners to address concerns identified within the school or local community.

The school recognises the relationship between harmful sexual behaviour, misogyny, misandry and child-on-child abuse. We will actively identify, challenge and address attitudes and behaviours that seek to normalise discrimination, harassment or violence.

We also recognise the influence of online content and social media. Staff will remain vigilant to the impact of harmful online material, including extreme misogynistic or misandrist ideologies and influencers, and will respond appropriately where such content gives rise to safeguarding concerns.

The school will provide support for children who have experienced, witnessed or been affected by incidents of sexual violence or sexual harassment. We will take reasonable steps to protect victims, alleged perpetrators and witnesses from bullying, intimidation or retaliation and will consider the needs of siblings and family members where appropriate.

### **Staff Awareness and Training**

All staff will receive appropriate safeguarding training to ensure they understand:

- The indicators and signs of child-on-child abuse.
- How to respond appropriately to disclosures and concerns.
- That the absence of reported incidents does not mean abuse is not occurring.
- The importance of maintaining an attitude of *"it could happen here"*.
- That concerns should always be acted upon and not delayed.
- That children may communicate abuse indirectly through behaviour, emotional presentation or changes in attendance or engagement.
- That disclosures may come from friends, witnesses or observations made by staff.
- That some children face additional barriers to reporting abuse due to disability, communication needs, gender, ethnicity, culture, faith, sexual orientation or other vulnerabilities.
- That a child displaying harmful behaviour may also be experiencing abuse or other unmet needs themselves.
- Their role in preventing, identifying and responding to child-on-child abuse.
- The importance of reporting concerns promptly to the DSL or Deputy DSL.
- The role social media may play before, during and after incidents.
- That exposure to harmful misogynistic or misandrist content online may itself constitute a safeguarding concern and should be discussed with the DSL.

### **Disciplinary Action**

The DSL will lead on safeguarding considerations relating to any alleged perpetrator, whilst school leaders will determine appropriate disciplinary responses in line with the Behaviour Policy.

Disciplinary action may be taken alongside Police or Children's Social Care investigations where appropriate. The existence of an external investigation does not prevent the school from reaching its own conclusions or implementing sanctions, provided doing so does not compromise any ongoing investigation.

When determining whether disciplinary action should proceed, the school will consider:

- Whether any action could prejudice a Police investigation or subsequent prosecution.
- Advice received from Children's Social Care, the Police or other relevant agencies.
- Whether sufficient information is available for the school to reach a reasonable and balanced conclusion.
- The rights, welfare and educational needs of all children involved.

The welfare of all children will remain paramount throughout the process.

## **7.9 Making or sharing of nudes and semi-nudes**

### **Your responsibilities when responding to an incident**

All incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual, require a safeguarding response. If you are made aware of an incident involving the consensual or non-consensual making or sharing of nude or semi-nudes, including where generated by AI, you must report it to the DSL (or deputy DSL) immediately.

You must **not**:

- › View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- › Delete the imagery or ask the pupil to delete it
- › Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- › Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- › Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

### **Initial review meeting**

Following a report of an incident, the DSL (or deputy DSL) will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- › Whether there is an immediate risk to pupil(s)
- › If a referral needs to be made to the police and/or The Family Front Door.
- › If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)

- › What further information is required to decide on the best response
- › Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- › Whether immediate action should be taken to delete or remove images or videos from devices or online services
- › Any relevant facts about the pupils involved which would influence risk assessment
- › If there is a need to contact another school, college, setting or individual
- › Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or The Family Front Door. if:

- › The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident (See appendix 2)
- › There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to their SEN)
- › What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- › The imagery involves sexual acts and any pupil in the images or videos is under 13
- › The DSL has reason to believe a pupil is at immediate risk of harm owing to the making or sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Principal and other members of staff as appropriate, may decide to respond to the incident without involving the police or The Family Front Door.. The decision will be made and recorded in line with the procedures set out in this policy.

### **Further review by the DSL (or deputy DSL)**

If at the initial review stage a decision has been made not to refer to police and/or The Family Front Door., the DSL (or deputy DSL) will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to The Family Front Door. and/or the police immediately.

### **Informing parents/carers**

The DSL (or deputy DSL) will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through [a safer schools officer, a police community support officer, local neighbourhood police, dialling 101].

### **Recording incidents**

All incidents of making or sharing of nudes and semi-nudes, including where generated by AI, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 18 of this policy also apply to recording these incidents.

## Curriculum coverage

Pupils are taught about the issues surrounding the making or sharing of nudes and semi-nudes as part of our computing curriculum and online safety curriculum.

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment. This also includes making such images, including where generated by AI
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to make, provide (or forward) such images
- The receipt of such images

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

## 7.10 Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
  - Through our Safeguarding Children's Policy pupils are taught what respectful relationships should look like and who to talk to if you do not feel safe.
  - Children know that there are trusted adults who they can talk to safely, they can choose these trusted adults.

### **7.11 Safeguarding risk assessments**

The school will complete safeguarding risk assessments where appropriate.

This may include:

- Child-on-child abuse.
- Sexual harassment.
- Sexual violence.
- Self-harm.
- Suicidal ideation.
- Exploitation concerns.
- Missing child incidents.
- Significant behavioural concerns.

Risk assessments will be reviewed regularly and updated where circumstances change.

## **8. Online Safety and the Use of Mobile Technology**

In accordance with the Statutory Framework for the Early Years Foundation Stage, this policy includes the use of mobile phones, cameras and digital technology within St Stephen's CofE First School. The school recognises that technology plays an increasingly significant role in children's lives and learning and, whilst providing many educational benefits, can also present safeguarding risks.

The school is committed to creating a culture where children are protected from potentially harmful and inappropriate online material and where technology is used safely, responsibly and appropriately by pupils, staff, volunteers, governors and visitors.

To achieve this, the school will:

- Maintain robust filtering and monitoring systems to safeguard children from harmful, inappropriate or illegal online content.
- Promote a whole-school culture of online safety through education, training and clear expectations.
- Educate pupils to use technology safely, responsibly and respectfully.
- Work in partnership with parents and carers to promote safe online behaviours both at school and at home.
- Ensure all staff understand their safeguarding responsibilities in relation to technology and online safety.
- Identify, respond to and escalate concerns relating to online safety and digital safeguarding in accordance with this policy and the Trust Whistleblowing Policy where appropriate.

### **Mobile Phones, Cameras and Digital Devices**

St Stephen's CofE First School operates as a mobile phone-free environment during the school day.

#### **To safeguard pupils:**

Staff may bring personal mobile phones onto the school site but these must be switched to silent and securely stored in the designated locked cupboard throughout the school day.

Personal mobile phones may only be accessed during non-contact time and away from pupils.

- Staff may use personal devices for identification verification purposes, such as logging into secure systems, only when pupils are not present.
- Personal devices must never be used to photograph, video or record pupils.
- Only school-owned and authorised devices may be used for photographing or recording children.
- Images of pupils will only be taken where appropriate parental consent has been obtained.
- Images will be stored securely in accordance with Trust data protection procedures.
- Staff must never share images or information relating to pupils through personal email accounts, personal devices, messaging applications or social media platforms.
- Visitors, volunteers, students and contractors must comply with the school's expectations regarding mobile phones and photography whilst on site.
- Any misuse of technology, mobile phones, cameras or image-sharing platforms will be treated as a safeguarding concern and addressed through the appropriate disciplinary, safeguarding or whistleblowing procedures.

### **The Four Categories of Online Risk**

The school's approach to online safety is based on the four key categories of risk identified within Keeping Children Safe in Education:

#### **Content**

Being exposed to illegal, harmful or inappropriate content, including pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, violent content, misinformation, disinformation and conspiracy theories.

#### **Contact**

Being subjected to harmful online interactions, including grooming, exploitation, coercion, peer pressure, commercial influence, and contact from individuals seeking to cause harm or exploit children.

#### **Conduct**

Online behaviour that increases the likelihood of harm, including cyberbullying, harassment, the sharing of personal information, the creation or sharing of inappropriate images, and online behaviours that place pupils or others at risk.

#### **Commerce**

Risks associated with online financial activity, including phishing, scams, fraud, gambling and inappropriate advertising.

### **To Promote Online Safety the School Will:**

- Deliver age-appropriate online safety education through the curriculum.
- Teach pupils how to use technology safely and responsibly.
- Help pupils understand the importance of protecting personal information.
- Teach pupils how to recognise harmful, inappropriate or unsafe online behaviour.
- Ensure pupils know how and where to report online safety concerns.
- Educate pupils about cyberbullying and encourage them to report concerns whether they are victims or witnesses.
- Provide safeguarding and online safety training for all staff during induction and through regular updates thereafter.
- Ensure all staff understand their responsibilities regarding filtering, monitoring and reporting concerns.
- Provide online safety information and guidance to parents and carers through the school website, newsletters, workshops and parent meetings.
- Maintain effective filtering and monitoring systems across the school's network and devices.
- Review online safety arrangements annually through a formal risk assessment process.
- Review the effectiveness of filtering and monitoring systems at least annually. This review will be conducted by the member of the Senior Leadership Team responsible for filtering and monitoring, supported by the DSL and IT support provider.
- Ensure staff understand the restrictions placed on the use of personal mobile phones and cameras.

- Ensure pupils and parents understand expectations regarding the acceptable use of technology.
- Apply appropriate sanctions where the misuse of technology breaches school policies.
- Ensure staff use their powers to search and confiscate devices only in accordance with current DfE guidance.
- Provide regular safeguarding updates relating to online safety for all staff.

Review safeguarding and online safety arrangements annually and whenever new risks emerge. This section should be read alongside the school's Online Safety Policy, Mobile Phone Procedures, Behaviour Policy, Anti-Bullying Policy and other relevant Trust policies.

### **8.1 Artificial Intelligence (AI)**

Generative Artificial Intelligence (AI) tools are becoming increasingly common and accessible. Staff, pupils and families may be familiar with platforms such as ChatGPT, Google Gemini and other AI-powered applications.

St Stephen's CofE First School recognises that AI can support teaching, learning, accessibility and administrative processes. However, AI technologies may also introduce safeguarding risks, including:

- Cyberbullying and online harassment.
- Online grooming and exploitation.
- The creation of deepfake images, videos or audio recordings.
- The generation of harmful, misleading or inappropriate content.
- The creation or manipulation of explicit images.
- Misinformation and disinformation.
- Breaches of privacy, confidentiality or data protection.

Any use of AI to bully, intimidate, harass, exploit or place a child at risk will be treated as a safeguarding concern and responded to in accordance with this policy, the Behaviour Policy and the Anti-Bullying Policy.

Staff must exercise professional judgement when using AI technologies and ensure that any AI tool used within school is appropriate, secure and compliant with safeguarding and data protection requirements. Where new AI applications are introduced, suitable risk assessments must be completed before use.

The school's filtering, monitoring and safeguarding arrangements apply equally to the use of AI technologies and emerging digital platforms. Staff must remain vigilant to the evolving risks associated with AI and report any concerns to the Designated Safeguarding Lead without delay.

### **9. Notifying parents or carers**

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL (or deputy DSL) will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL (or deputy DSL).

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with The Family Front Door team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or The Family Front Door to make sure our approach to information sharing is consistent.

The DSL (or deputy DSL) will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed

- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, for example, moving them out of classes with the victim, and the reason(s) behind any decision(s)

## **10. Pupils with special educational needs, disabilities or health issues**

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges both online and offline. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse
- The need for intimate care or that these children are isolated from others
- That these children are more likely to be dependent on adults for care
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or being unable to understand the consequences of doing so

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy DSL) and the SENDCo. The school consider extra pastoral support and attention for these children, and ensure any appropriate support for communication is in place.

### **10.1 Intimate Care**

Some pupils may require assistance with intimate care as a result of their age, disability, medical needs or developmental stage.

The school recognises that intimate care is a safeguarding matter and will ensure that all intimate care is provided in a respectful, sensitive and age-appropriate manner that promotes dignity, privacy and independence.

Where regular intimate care is required, an individual care plan will be agreed with parents/carers and reviewed regularly.

Staff providing intimate care will:

- Follow the school's Intimate Care Policy and procedures.
- Respect the child's dignity, wishes and feelings.
- Encourage independence wherever possible.
- Work in pairs where risk assessments or care plans identify this as necessary.
- Record and report any concerns arising during the provision of intimate care.

Any marks, injuries, changes in presentation, comments made by a child, or concerns identified during intimate care will be reported immediately to the Designated Safeguarding Lead and recorded in accordance with safeguarding procedures.

## **11. Pupils with medical conditions**

An incident relating to the management of a child's medical condition (including allergies) does not itself warrant a referral to local safeguarding partners.

A safeguarding referral will be made where an incident highlights concern that the child might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family because of their medical condition. For example, information about the child's medical condition might be withheld from the school, or the child may be repeatedly sent to school without essential medication, putting them at risk.

## **12. Young carers**

The school recognises that caring responsibilities can impact on a child's attendance, attainment, behaviour and wellbeing, and early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health services.

## **13. Pupils with a social worker**

Some pupils may have a social worker due to safeguarding concerns, welfare needs or their status as a child in need. We recognise that experiences of adversity and trauma can increase a child's vulnerability to further harm and may also present barriers to attendance, engagement, learning, behaviour and emotional wellbeing.

The DSL and all staff will work collaboratively with social workers and other relevant professionals to support and protect vulnerable pupils and to promote their welfare, safety and educational progress.

Where the school is aware that a pupil has a social worker, the DSL will ensure this information is taken into account when making decisions relating to the pupil's safety, welfare and educational outcomes. This may include decisions regarding:

- Responding to unexplained absences, persistent absence or children missing education where safeguarding concerns are known or suspected.
- The provision of pastoral, emotional and academic support.
- Attendance monitoring and intervention.
- Safeguarding risk assessments and planning.
- Additional support to promote engagement, wellbeing and achievement.

The DSL will ensure that pupils with a social worker are included on the school's Vulnerable Children Register and are subject to regular safeguarding monitoring and review to help ensure their needs are identified and appropriately supported.

### **13a Vulnerable Children Register**

The DSL will maintain a Vulnerable Children Register.

This may include children who:

- Have a Child Protection Plan.
- Are Children in Need.
- Are Looked After.
- Are Previously Looked After.
- Are young carers.

- Experience domestic abuse.
- Have mental health vulnerabilities.
- Are at risk of exploitation.
- Have attendance concerns.
- Have significant medical needs.

The register will be reviewed regularly.

### **Children Missing Education and Attendance**

The operational arrangements for:

- first-day response
- home visits
- welfare checks
- persistent absence
- children missing education

are set out in the CRST Attendance Policy and associated procedures. Staff must follow both this safeguarding policy and the Attendance Policy when responding to absence concerns.

## **14. Looked-after and previously looked-after children**

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- › Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- › The DSL has details of children's social workers and relevant virtual school heads

We have appointed a designated teacher, Sarah Barrett, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- › Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- › Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

## **15. Pupils who are lesbian, gay or bisexual**

The school recognises that a child being lesbian, gay, or bisexual is not in itself a risk factor for harm. However, pupils who are (or who are perceived by other children to be) lesbian, gay, or bisexual can sometimes be vulnerable to discriminatory bullying. See our behaviour policy for more detail on how we prevent bullying based on sexuality.

Any concerns should be reported to the DSL.

## **16. Pupils who are questioning their gender**

### **16.1 Supporting pupils who are questioning their gender**

We are aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, such as relating to relationships with family, peers or their broader social environment.

We will take a strong, proactive stance on all forms of bullying based on gender. The school will ensure that children and their families are aware that, while the school will appropriately sanction any cases of bullying or harassment, and take a strong stand against bullying, it must also be conscious of the rights of pupils and staff in relation to their religion or belief.

When supporting a pupil questioning their gender, we will take into account the principle of taking a careful approach. The DSL will lead in these cases.

### **16.2 Involving parents/carers in cases of pupils questioning their gender**

Where a child who is questioning their gender asks for support from the school, we will engage parents/carers as a matter of priority.

However, in the rare circumstances where involving parents/carers might put a pupil at greater risk than not involving them, the DSL will determine a course of action needed to safeguard the child before contacting parents/carers or any decisions are taken.

Where a child confides in a member of staff about their feelings but does not ask the school to make changes to how they are treated, the school will only break any confidence if there is a related safeguarding risk.

### **16.3 Considering requests for support with social transition**

The school will not initiate any action regarding social transition. However, when a pupil or their parent/carer requests that the school makes changes or puts support in place to facilitate the pupil presenting as the opposite biological sex ("social transition"), we will work together with parents/carers to determine what is in the best interests of the child and other children.

Members of staff will not adopt any changes relating to social transition unless a decision has been made by the school and a child's parents/carers have been involved (as set out in Keeping Children Safe in Education (KCSIE)).

In making decisions about supporting social transition, the school will ensure compliance with its obligations in respect of safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by the school's evaluation of the welfare and best interests of the child and other children. The schools will make decisions in line with the following principles:

- The school has statutory duties to safeguard and promote the welfare of all children: the first step when considering a child's request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child's wishes
- Parents and carers should be actively involved and their views treated with importance: (except in the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them) where a child who is questioning their gender asks for support from the school parents/carers will be engaged as a matter of priority and their views will carry great weight and be properly considered

- Accommodating social transition is an active intervention so the school will take a very careful approach: social transition is an active intervention that may have significant effects on the child in terms of their psychological functioning and longer-term outcomes
- The school will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition

The school will ensure that the decision-making process is documented and records are kept.

The circumstances or needs of a child may change over time, and the school may need to review its original decision and will involve the DSL in doing so.

#### **16.4 Rules on single-sex spaces**

Pupils are not allowed into toilets, changing rooms, showers, designated for the opposite biological sex, with no exceptions.

#### **16.5 Rules on single-sex sports**

The school may teach and play some sports or games, or activities of a competitive nature, in single-sex groups where the physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa). The school can separate children according to their biological sex in these circumstances.

Some sports may need to be played in single-sex groups from a certain age to ensure children's safety. Where single-sex sports are implemented for safety reasons, there are no exceptions and pupils must not be allowed to participate in sports designed for the opposite sex.

### **17. Complaints and concerns about school safeguarding policies**

#### **17.1 Complaints against staff**

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see Central Region Schools Trust 'Managing Allegations' policy).

#### **17.2 Other complaints**

All complaints are responded to in line with the Trust's Complaints Policy [Complaints Policy May 2026.pdf](#)

Early years providers should take account of requirements related to complaints set out in the safeguarding and welfare section of the statutory framework for the Early Years Foundation Stage (section 3.).

#### **17.3 Whistleblowing**

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

All staff should be aware of their duty to raise concerns, where they exist (including low-level concerns), about the attitude or actions of colleagues using the Trust's confidential reporting (whistleblowing) policy.

Whistleblowing concerns about a Principal should be raised with the Chief Executive Officer. The CEO will inform the Chair of the Local Governing Body.

Whistleblowing concerns about a member of the Trust's executive or central team, the CEO will be informed immediately. If the allegation concerns the CEO, the Chair of the Trust Board will be informed immediately.

For allegations concerning a Principal or any member of the Trust's executive or central teams, the CEO will discuss the content of the allegation with the LADO, prior to undertaking any investigation using the Trust Whistleblowing Policy and Part Four of KCSIE.. For allegations concerning the CEO, the Chair of the Trust Board will discuss the content of the allegation with the LADO, prior to undertaking any investigation using the Trust Whistleblowing Policy and Part Four of KCSIE. For all other allegations, a Principal will discuss the content of the allegation with the LADO, prior to undertaking any investigation using the Trust Whistleblowing Policy and Part Four of KCSIE

Staff will be made aware that if they feel unable to raise a child protection failure internally, they can contact the **NSPCC whistleblowing helpline**

## **18. Record-keeping**

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the rationale for those decisions must be recorded in writing using CPOMS. This should include instances where referrals were or were not made to another agency such as The Family Front Door or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

Concerns and referrals will be kept in a separate child protection file for each child and should only be accessed by those who need to see it.

Safeguarding and child protection records will be retained until the child's 25th birthday.

Schools must retain evidence of the transfer and receipt of safeguarding records.

Child protection files will be transferred securely, separately from educational records and in line with statutory guidance.

Where safeguarding concerns are significant or complex, the DSL will discuss the child directly with the receiving school's DSL.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within:

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL (or deputy DSL) will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

In addition:

- The Central Region Schools Trust Recruitment & Selection Policy sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks

- The Central Region Schools Trust 'Managing Allegations Policy' sets out our policy on record-keeping with respect to allegations of abuse made against staff

## **19. Training**

### **19.1 All staff**

All staff members will undertake safeguarding and child protection training at induction, including on whistleblowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- Have regard to the Teachers' Standards to support the expectation that all teachers:
  - Manage behaviour effectively to ensure a good and safe environment
  - Have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

Volunteers will receive appropriate training, if applicable.

### **19.2 The DSL and deputies**

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, DSL network meetings, or taking time to read and digest safeguarding developments).

They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

### **19.3 Governors**

All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

### **19.4 Recruitment – interview panels**

At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures. Please see the Central Region Schools Trust 'Recruitment and selection policy'

## **19.5 Staff who have contact with pupils and families**

DSL (and deputy DSLs) who have contact with children and families will have opportunity to access supervision, which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

## **19.6 Early Years Foundation Stage**

The school recognises that children in the Early Years Foundation Stage (EYFS) are particularly vulnerable and requires all staff to maintain the highest standards of safeguarding, vigilance and professional curiosity. The school will comply with the safeguarding and welfare requirements of the Statutory Framework for the Early Years Foundation Stage and ensure that the welfare of children is promoted at all times.

The school will ensure that:

- The Designated Safeguarding Lead (DSL) and Deputy DSLs have an appropriate understanding of EYFS safeguarding and welfare requirements and provide support, guidance and oversight to all EYFS staff.
- All staff working within EYFS receive safeguarding training appropriate to their role, including child protection, online safety, safer working practices, recognising indicators of abuse and neglect, and understanding the specific vulnerabilities of younger children.
- Children are taught, through age-appropriate interactions and activities, how to recognise safe and unsafe situations, identify trusted adults and communicate worries or concerns.
- Each child is assigned a key person who supports their welfare, wellbeing and development and acts as an important link between home and school.
- Appropriate supervision arrangements are in place to support staff, monitor safeguarding practice and promote the welfare and safety of children.
- Staffing arrangements meet statutory requirements, including appropriate adult-to-child ratios, suitable deployment of staff and effective supervision of children at all times.
- At least one person with a current paediatric first aid qualification is available at all times when children are present and accompanies children on educational visits where required.
- All staff, volunteers, students and visitors are subject to appropriate safeguarding checks and suitable people requirements in line with safer recruitment guidance and statutory responsibilities.
- Any concerns regarding the suitability of an adult to work with children, including disqualification considerations where applicable, are referred immediately to the Headteacher and managed in line with relevant statutory guidance.
- Robust procedures are in place for the administration of medicines, management of accidents and injuries, intimate care, toileting, collection and non-collection of children, and responding to children who go missing from education or the setting.
- Mobile phones, cameras and other electronic devices are used in accordance with the school's safeguarding and acceptable use procedures to protect children from harm and maintain their privacy and dignity.
- The physical environment is safe, secure and suitable for children, with regular risk assessments undertaken and appropriate action taken to minimise identified risks.

- Effective partnerships are maintained with parents, carers, health professionals, social care and other agencies to ensure children receive timely support and protection where concerns arise.
- Records relating to safeguarding concerns are maintained appropriately and transferred securely when children move settings or schools.
- Any safeguarding concern relating to an EYFS child is acted upon immediately in accordance with this policy, local safeguarding partnership procedures and statutory guidance.

The school recognises that safeguarding is everyone's responsibility and that early identification, intervention and partnership working are critical in promoting positive outcomes for young children. All concerns, however small they may appear, will be taken seriously and responded to promptly, with the child's welfare remaining paramount at all times.

## **20. Monitoring arrangements**

This policy will be reviewed **annually** by Sarah Callanan At every review, it will be approved by the full governing board.

## **21. Links with other policies**

This policy links to the following policies and procedures:

- Behaviour
- Staff code of conduct
- Complaints
- Health and safety
- Attendance
- Online safety
- Mobile phone principles
- Equality, Diversity and Inclusion
- Relationships, sex and health education
- First aid [Early years providers should note the first aid requirements set out in the EYFS statutory framework]
- Curriculum
- Designated teacher for looked-after and previously looked-after children
- Privacy notices
- Whistleblowing
- Anti-bullying

## Appendix 1: types of abuse

**Abuse is** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others.

This can be particularly relevant in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver 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.

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children
- Verbal abuse such as criticism, belittling, or name-calling

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- 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.

**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)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

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

## **Appendix 2: specific safeguarding issues**

### **Assessing adult-involved nude and semi-nude sharing incidents**

This section is based on part 1 of the Department for Science, Innovation and Technology and the UK Council of Internet Safety's advice for education settings.

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

#### **Sexually motivated incidents**

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

#### **Financially motivated incidents**

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

### **Children who are absent from education**

A child being absent from education for prolonged periods, repeatedly absent, or whose attendance changes significantly may be at increased risk of safeguarding concerns. These concerns may include abuse, neglect, child sexual exploitation, child criminal exploitation, mental health difficulties, substance misuse, radicalisation, forced marriage, female genital mutilation (FGM) or other forms of harm

St Stephen's CofE First School recognises that attendance and safeguarding are closely linked. Attendance concerns will be considered as part of the school's safeguarding arrangements and reviewed in line with the Central Region Schools Trust Attendance Policy.

Some children may be at increased risk of becoming absent from education or missing education, including those who:

- Are at risk of harm, abuse, neglect or exploitation.
- Have a Child Protection Plan or Child in Need Plan.
- Are Looked After or Previously Looked After Children.
- Have a social worker.
- Have SEND or significant medical needs.
- Are young carers.

- Are at risk of forced marriage or FGM.
- Come from Gypsy, Roma or Traveller families.
- Come from service families.
- Go missing from home or care.
- Are supervised by the youth justice system.
- Have experienced domestic abuse.
- Are vulnerable to criminal or sexual exploitation.
- Have recently arrived in the UK.
- Cease attending school unexpectedly. [CRST Model...26-2027 V1 | Word]

## **Attendance as a Safeguarding Responsibility**

The school adopts an inclusive and supportive approach to attendance. Staff will seek to understand and address the barriers that may be preventing a child from attending school regularly. Attendance information will be considered alongside pastoral, welfare and safeguarding information when assessing risk and determining appropriate support.

<https://csb1003200034fd965b.blob.core.windows.net/public/Trust Policies/CRST/Policies/CRST Pupil Attendance Policy.pdf>

The Designated Safeguarding Lead (DSL), attendance lead and pastoral leaders will work collaboratively to identify pupils whose attendance patterns may indicate emerging safeguarding concerns. Particular attention will be given to vulnerable pupils, pupils whose attendance is deteriorating and pupils whose absence patterns are unusual or unexplained.

## **Unexplained Absence**

Where a child is absent without explanation, first-day contact procedures will be initiated in line with the school's attendance procedures.

The school will:

- Make reasonable attempts to contact parents and carers.
- Contact emergency contacts where required.
- Consider the child's known vulnerabilities and safeguarding history.
- Share concerns with the DSL where appropriate.
- Record actions taken and outcomes appropriately.

Failure to establish contact with a parent or carer will not, in itself, be accepted as reassurance that a child is safe.

## **Home Visits and Welfare Checks**

Home visits may be undertaken where attendance concerns, welfare concerns or safeguarding concerns indicate that direct contact with the family is required.

The decision to undertake a home visit will be based on an assessment of:

- The child's vulnerability.
- Known safeguarding concerns.
- Attendance history.
- Information provided by parents or carers.
- Any other relevant circumstances.

Where appropriate, home visits will be completed in accordance with the school's attendance and safeguarding procedures and outcomes will be recorded.

Where the school is unable to establish a child's safety and wellbeing, consideration will be given to requesting a welfare check through Children's Social Care, the Family Front Door or the Police. Decisions and rationale will be recorded by the DSL.

### **Children Missing Education**

The school will comply with all statutory Children Missing Education requirements and local authority procedures.

Where a child leaves school without a confirmed destination, the school will:

- Make reasonable enquiries to establish the child's whereabouts.
- Share information with the Local Authority in accordance with statutory guidance.
- Maintain accurate records of actions taken.
- Escalate concerns where a child may be at risk of harm.

The school recognises that children who are missing education can be at significantly increased risk of abuse, neglect and exploitation and will ensure that concerns are responded to promptly and appropriately.

Where any member of staff believes a child may be suffering, or at risk of suffering, significant harm, they must immediately follow the school's safeguarding procedures. Referrals will be made to the Family Front Door, Children's Social Care and/or the Police where appropriate.

### **Professional Curiosity**

All staff are expected to demonstrate professional curiosity when considering attendance concerns.

Staff should respectfully question, explore and seek to understand circumstances that appear unusual, inconsistent or concerning. The absence of a disclosure does not mean the absence of risk, and staff should maintain an attitude of "**it could happen here**" when considering the welfare of children.

### **Child criminal exploitation**

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may

involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can be perpetrated by organised networks or gangs, and the victim may identify as part of this group.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL (or deputy DSL). The DSL (or deputy DSL) will trigger the local safeguarding procedures, including a referral to the The Family Front Door and the police, if appropriate.

### **Child sexual exploitation**

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. Most sexual abuse is committed by individuals known to the victim. It can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. Victims are not always recognised and can be criminalised for actions they take while under coercion.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship. Most sexual abuse is committed by individuals known to the victim.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL (or deputy DSL). The DSL (or deputy DSL) will trigger the local safeguarding procedures, including a referral to The Family Front Door and the police, if appropriate.

### **Child-on-Child Abuse (Including Harassment and Violence)**

Child-on-child abuse is when a child is subjected to abuse by another child or group of children. This can occur inside or outside school, face-to-face, online, or through a combination of both. Child-on-child abuse is a safeguarding issue and must never be dismissed as banter, horseplay, growing up, friendship difficulties or a normal part of childhood.

The school recognises that both the child who has experienced harm and the child displaying harmful behaviour may require safeguarding support. All concerns will be taken seriously, investigated appropriately and responded to in a timely manner.

The school maintains a zero-tolerance approach to sexual violence, sexual harassment and harmful sexual behaviour. We recognise that the absence of reports does not mean that abuse is not occurring and will maintain an attitude of "it could happen here".

Child-on-child abuse may include, but is not limited to:

- Bullying, including cyberbullying, prejudice-based bullying and discriminatory bullying
- Physical abuse, including hitting, kicking, shaking, biting, hair pulling or causing physical injury
- Abuse within intimate personal relationships between children
- Physical assault or the threat of harm, including incidents involving weapons
- Harmful sexual behaviour, sexual violence and sexual harassment
- Misogynistic or misandrist behaviour and language
- Sexual assault or causing another child to engage in sexual activity without consent
- Consensual and non-consensual sharing of nude or semi-nude images, including AI-generated images
- Upskirting
- Initiation, hazing or humiliation rituals
- Emotional abuse, coercion, intimidation and controlling behaviour
- Online abuse, including abusive messages, image sharing, exploitation or harassment.

The school's approach to preventing and responding to bullying is set out in the Trust Anti-Bullying Policy. While some incidents of bullying may be managed through behaviour and anti-bullying procedures, the school recognises that bullying can become a safeguarding concern where there is

evidence of significant harm, vulnerability, discrimination, exploitation, coercion, repeated targeting or an impact on a child's welfare. In such cases, the matter will be managed in accordance with this Child Protection and Safeguarding Policy and overseen by the Designated Safeguarding Lead (DSL).

Any report of child-on-child abuse will result in:

- Immediate consideration of the safety and wellbeing of all children involved
- Consultation with the DSL
- Appropriate recording on the school's safeguarding system
- Consideration of whether the matter meets the threshold for referral to Children's Social Care or the Police
- A risk assessment where appropriate
- Support for the child who has experienced harm
- Support and intervention for the child displaying harmful behaviour
- Ongoing monitoring and review of outcomes.

When considering incidents of harmful sexual behaviour, the school will take account of the age, developmental stage, understanding and individual circumstances of the children involved. The school recognises that children displaying harmful sexual behaviour may themselves have experienced abuse, trauma or other vulnerabilities and will ensure appropriate safeguarding support is provided.

The school will regularly review incidents, patterns and trends relating to child-on-child abuse to identify emerging risks, evaluate the effectiveness of preventative measures and inform future safeguarding practice

### **Domestic abuse**

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children including physical, sexual, emotional abuse, and stalking) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

Police must notify a school of a domestic abuse incident where a child is involved, has witnessed or been present, lives at (or is linked to) the address where it occurred, or where a Child Concern

Notification has been issued, regardless of whether the child was there at the time. The police should inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This notification should reflect the 'voice of the child' (for example, statements made the child or behaviour observed). This is the procedure set out in the statutory Operation Encompass guidance for information sharing.

The DSL (or deputy DSL) will provide support according to the child's needs and update records about their circumstances.

## **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL (or deputy DSL) will also make a referral to

The Family Front Door. Where children are living independently from their parent/carers (e.g. if they've been excluded from their family home), we will work with The Family Front Door team to support them.

## **So-called 'honour-based' abuse (including FGM and forced marriage)**

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL (or deputy DSL), who will activate local safeguarding procedures.

## **FGM**

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable
  - Finding it hard to sit still for long periods of time (where this was not a problem previously)
  - Spending longer than normal in the bathroom or toilet due to difficulties urinating

- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- › The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- › FGM being known to be practised in the girl's community or country of origin
- › A parent or family member expressing concern that FGM may be carried out
- › A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- › A girl:
  - Having a mother, older sibling or cousin who has undergone FGM
  - Having limited level of integration within UK society
  - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
  - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
  - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
  - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
  - Being unexpectedly absent from school
  - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

### **Forced marriage**

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the DSL (or deputy DSL) about their concerns in a secure and private place.

The DSL (or deputy DSL) will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fmfu@fco.gov.uk](mailto:fmfu@fco.gov.uk)
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

## Preventing radicalisation

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence
- **Extremism** is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs **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 of terrorism 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.

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and the [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends

- › Talking as if from a scripted speech
- › An unwillingness or inability to discuss their views
- › A sudden disrespectful attitude towards others
- › Increased levels of anger
- › Increased secretiveness, especially around internet use
- › Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- › Accessing extremist material online, including on social media
- › Possessing extremist literature
- › Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL (or deputy DSL).

Staff should **always** take action if they are worried.

### **Harmful sexual behaviour, sexual violence and sexual harassment between children in schools**

The school will respond to all signs, reports and concerns of harmful sexual behaviour (HSB), child-on-child sexual harassment and sexual violence. This includes incidents occurring outside of the school premises, and/or online.

Sexual violence refers to specific sexual offences under the Sexual Offences Act 2003 involving:

- › Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration, and A does not reasonably believe that B consents
- › Assault by penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents
- › Sexual assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents. Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault)
- › Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party)

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity, and each time activity occurs. A child under the age of 13 can never consent to any sexual activity, the age of consent is 16, and sexual intercourse without consent is rape.

HSB can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

HSB exists on a continuum and may escalate into sexual harassment or sexual violence. It can occur online or face-to-face (both physically and verbally) and is never acceptable. Sexual violence and sexual harassment may overlap.

Children who are victims of HSB, sexual violence and sexual harassment will likely find the experience distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay and bisexual children, or children questioning their gender are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them
- Recognising the intersection of misogyny/misandry and harmful sexual behaviour. It's important not to dismiss issues that may seem minor at first, such as derogatory language, as behaviours can escalate into more severe forms of child-on-child abuse

If staff have any concerns about HSB, sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

## **Serious violence**

Serious violence is a continuing safeguarding concern which may involve:

- Physical assault
- Carrying, threatening with or using weapons (often in the context of peer conflict or bullying)
- Criminal exploitation

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Having been frequently absent, suspended, spent time in alternative provision, or permanently excluded from school
- Having been involved in offending, such as theft or robbery
- Being male
- Having experienced child maltreatment
- Having used drugs or alcohol in early adolescence
- Having previously been a victim or previously perpetrated violence

Staff will be aware of these indicators and risk factors and will be alert to when children might be at highest risk around the school day (for example, immediately after school).

If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, including a child carrying or using a weapon (or expressing intent to do so), they will report this to the DSL (or deputy DSL).

The DSL (or deputy DSL) will:

- Assess the risk to both the individual pupil and others in the school, consider wider information or concerns and take appropriate action
- Put in place a safety and support plan for the pupil (depending on the risk)
- Where relevant, consider action to de-escalate peer conflict

## **Checking the identity and suitability of visitors**

The Trust has standalone Visitor Protocols which should be adhered to at all times.

## **Non-Collection of Children**

If a child remains uncollected at the end of the school day:

1. The child will remain supervised by two members of staff wherever possible.
2. Parents/carers will be contacted immediately.
3. All emergency contacts will be contacted if parents cannot be reached.
4. The DSL or senior leader will be informed.
5. After one hour, or sooner where safeguarding concerns exist, advice will be sought from Children's Services.
6. If the child remains uncollected and Children's Services cannot make alternative arrangements, the police will be contacted.
7. A CPOMS record will be completed.

Where concerns exist regarding the fitness of a collecting adult, staff will seek immediate support from the DSL and, where necessary, the police.

### **Missing Pupils**

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as quickly as possible.

Where a child cannot be located:

- The member of staff identifying the concern will immediately notify the DSL, Deputy DSL or Principal.
- A coordinated search of the building, grounds and known locations will begin immediately.
- The school office will establish whether the child has been signed out or legitimately collected.
- Parents/carers will be contacted as soon as this initial check has been completed.
- If the child is not located within 10 minutes, or sooner where risk factors exist, the police will be contacted.
- The DSL will undertake an immediate risk assessment taking account of:
  - age
  - SEND needs
  - medical needs
  - previous missing episodes
  - safeguarding concerns
- Staff will only search beyond the school site where this has been authorised by the Principal or DSL and where sufficient supervision remains in school.
- A full chronology will be recorded on CPOMS.
- A post-incident review will be undertaken and any lessons learned shared with staff.

### Appendix 3: Form One

**Logging a Concern about a Child's Safety and Welfare – staff and visitors (without access to electronic reporting system)**

|                                                                                                                     |  |           |               |
|---------------------------------------------------------------------------------------------------------------------|--|-----------|---------------|
| Pupil's Name:<br>d.o.b.                                                                                             |  | Yr. gp.   | Student name: |
| Date:                                                                                                               |  | Time:     |               |
| Name:<br>.....                                                                                                      |  | .....     |               |
| Print                                                                                                               |  | Signature |               |
| Position:                                                                                                           |  |           |               |
| Note the reason(s) for recording the incident.                                                                      |  |           |               |
| Details of concern/incident - record the who/what/where/when factually (continue on reverse of sheet if necessary): |  |           |               |
| Any other relevant information (witnesses, immediate action taken)                                                  |  |           |               |
| Action taken                                                                                                        |  |           |               |
| Reporting staff signature ..... Date .....                                                                          |  |           |               |

DSL – Response/Outcome

DSL signature ..... Date .....

Check to make sure your report is clear now - and will also be clear to a stranger reading it next year.

**PLEASE PASS THIS FORM TO YOUR DESIGNATED SAFEGUARDING LEAD**

|                                                                             |                |
|-----------------------------------------------------------------------------|----------------|
| <b>Continuation Sheet</b>                                                   |                |
| <b>Incident /Concern; other relevant information; Action Taken; Outcome</b> |                |
| <b>PUPIL NAME:</b>                                                          |                |
| <b>DATE</b>                                                                 | <b>DETAILS</b> |

|                  |  |
|------------------|--|
|                  |  |
| <b>Signature</b> |  |