University Schools Trust
A transformational education

Safeguarding & Child Protection Policy

2026 - 2027

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0. Document Control

The table below contains the changes made between the different final editions of this document set for approval. This is to help provide information to those reviewing and approving the document of the changes being made.

Document Edition	Section	Details of change
June 2026	Multiple	Addition of community-based early help and targeted early help delivered through Family Help; addition of 'trainee teachers' Addition of 'data protection laws' (Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), and the Data (Use and Access) Act 2025).
	2.6	Addition of section on gender questioning; updated mental health concerns
	2.6, 2.7	Updated sections on LAC and SEND pupils
	4.1	Updated indicators of sexual abuse and added modern slavery
	4	Updated safeguarding issues
	4	Updated roles and responsibilities; Removed annex and replaced with Part 1 (in full). Addition of arrangements for cover when the DSL is absent.
	4.4	Updated PSED and reference to misogyny
	4.8	Updated definition of assault by penetration
	4.8	Updated sections for CCE and CSE
	4.12	Rewritten Forced Marriage section
	4.14	Rewritten FGM section
	4.15	Rewritten Virginity Testing and Hymenoplasty section
	4.17	Updated child-on-child abuse section
	4.19	Updated serious violence section
	4.20	Updated section with new terminology 'nudes or semi-nudes'
	6	Updated section on sharing information
	10	Updated alternative provision guidelines
	Appendix	Added section on sport, toilets and school premises. Added curriculum resource links. Updated online risk categories. Added mobile phone free environments.
July 2025	1	Amended definitions
	3	Added new UST Safeguarding vision and amended text
	4	Updated legislation and statutory guidance
	5	Updated roles and responsibilities; moved mobile phone use/mutli agency working
	6	Renamed, amended section and subsumed pupils at risk of harm and Early Help
	7	Subsumed Mental health (previously section 8)
	9	Removed section
	12	Amended safer recruitment section and subsumed the SCR section
	13	Transferred this section into the Appendix (section 3) Updated online safety and AI Moved children in the court system/absent from education to section 3
	13	Updated AP safeguarding checks
	Appendix	Moved reporting staff concerns, AP, work experience
January 2025	14.6	New definition of terrorism

1. Definitions

The **Trust** refers to the company known as the University Schools Trust, East London and all Trustees, Governors and Staff who work within it.

A **School** refers to an individual academy within the Trust, as denoted by their Unique Reference Number. As such a 'school' may span one or several phases of education to the individual academies within the Trust. Depending on the context the term "School" may refer to a singular academy or to all the academies within the Trust but as separate entities.

Staff refers to any individual who is employed by the Trust or who operates on the Trust's behalf, e.g. Trustees and Governors, and those working in a voluntary capacity.

A **Parent** includes the natural or adoptive parent of a pupil as well as any non-parent / carer who has parental responsibility including being involved in the day-to-day care of a pupil.

A **Pupil** includes any incoming or current pupil at any School within the Trust who is 18 and under. It also includes any individual who was previously a pupil at any School within the Trust and who has left within the appropriate timeframe for consideration as necessary, e.g. complaints. The term pupil is used as standard by the UST in its policy documents but can be replaced with the term "student" or "child" with no change of definition. **Children** includes everyone aged 18 and under.

The **Headteacher** is defined as the individual who has ultimate responsibility for a school in line with UST strategy, approach, ethos and values. Individual schools may have alternative titles for this position such as Executive Headteacher or Head of School.

Safeguarding and promoting the welfare of children is defined as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing 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.

The following 3 **safeguarding partners** are identified in KCSIE and have a legal duty 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 for an area within the LA
- The chief officer of police for an area in the LA area

Keeping Children Safe in Education is the Statutory Guidance written by the Department for Education which guides our policy. It is known throughout this policy by its acronym: **KCSIE**.

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.

2. Scope of the policy, aims and ethos

This policy applies to all staff, parents and children as defined above.

UST Safeguarding vision statement:

At UST, safeguarding is our collective responsibility because everyone in our community deserves to feel safe and secure. We are dedicated to being compassionate, proactive and vigilant in adhering to our policies, intervening at the earliest opportunity, ensuring that no issue goes unnoticed. Together, we can fulfil our promise to provide a transformational education that supports students' academic, social and emotional growth.

5.1. Aims

At UST we aim to:

1. Create a safe, respectful environment where children feel secure and confident to seek help.
2. Ensure all staff understand their safeguarding responsibilities and how to report concerns with clear procedures for handling suspected abuse, followed by all staff.
3. Train staff to consider contextual safeguarding recognising external factors that may impact a child's safety or wellbeing
4. Ensure all staff with child access are properly vetted, with accurate records maintained.
5. Clearly communicate the school's safeguarding commitment to pupils, parents, and partners.
6. Support children's development to build confidence, independence, and emotional security.
7. Enforce a zero-tolerance stance on sexual violence and harassment.
8. Monitor and support children at risk, contributing to assessments and care plans.
9. Promote strong communication among staff regarding safeguarding matters.
10. Build effective partnerships with external agencies, especially with the Police and MASH/MAST.

5.2. Principles

The welfare of the child is paramount:

- Every child has the right to feel safe and be protected, no matter who they are.
- All adults – including staff, volunteers, and governors must act if they suspect a child is at risk.
- Our schools aim to be safe and caring places that helps children grow and thrive.
- Pupils and staff involved in safeguarding and child protection issues will receive appropriate support and supervision.

Children should be supported through:

- Recognising that abused or vulnerable children may feel helpless, ashamed, and struggle with self-worth.
- Understanding that school may be their only source of stability.
- Acknowledging that affected children may show a wide range of behaviours, including aggression, withdrawal, or signs of mental health issues.
- Being aware of the impact abuse, neglect, or hardship can have on a child's mental health, behaviour, and education.

5.3. Our schools will support all children by:

- Fostering self-esteem and assertiveness through curriculum and relationships, without promoting aggression or bullying.
- Creating a caring, safe, and supportive school environment.
- Responding compassionately to students experiencing distress or anxiety.

- Providing access to external support services and make referrals when needed.
- Collaborating with other settings and safeguarding agencies.
- Ensuring the Designated Safeguarding Lead (DSL) supports staff in safeguarding duties.
- Notifying MASH/MAST promptly when significant concerns arise.
- Supporting students whom there have been concerns about who have left the school by securely sharing relevant information and medical records.
- Educating students on risk management, including online safety, through PSHE and RSE.
- Using appropriate resources and tools to identify and support students with mental health needs.

5.4. Prevention and Protection

We acknowledge the vital role schools play in preventing harm to children by fostering open communication with trusted adults, encouraging supportive peer relationships, and promoting a culture of safety and protection.

Accordingly, the school community is committed to upholding these principles:

- Create a safe and supportive school environment where children feel valued and confident to speak to trusted adults.
- Recognise the school's role in preventing harm by offering stability, protection, and positive relationships.
- Encourage children to share their feelings through regular activities like safety questionnaires and anti-bullying initiatives.
- Ensure all children know which adults they can approach if they feel worried or unsafe.
- Embed safeguarding throughout the curriculum, including PSHE, with lessons on online safety, road safety, and personal wellbeing.
- Provide targeted support for key transitions, such as moving to new settings or stages.
- Support staff through the Designated Safeguarding Lead (DSL) to carry out their safeguarding responsibilities.
- Ensure pupils, staff, and parents understand safe use of mobile technology and the associated risks.
- Train staff to identify children who may benefit from community-based early help and targeted early help delivered through Family and early help and respond appropriately.

3. Links to legislation and guidance documents

5.1. Relevant internal policies

This policy should be read in conjunction with the following documents:

- Additional Education and SEND Offer
- Allegations of abuse against staff policy
- Anti-Bullying Policy
- Attendance and Punctuality Policy
- Data Protection Policy
- Early Years Foundation Stage Policy
- Educational Visits Policy and Procedures
- Health and Safety Policy
- Induction Policy
- Looked After Children Policy
- Mobile Devices and Remote Access Policy
- Online safety Policy
- Safer Recruitment Policy
- School Behaviour Policy
- Staff Code of Conduct
- Statement for Visiting Speakers
- Use of the Internet Policy
- UST Articles of Association
- Whistleblowing Policy

5.2. Relevant external documents

Legislation:

- The Human Rights Act 1998
- The Children Act 1989 (and 2004 amendment)
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)

- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006
- Childcare Act 2006
- Apprenticeships, Children and Learning Act 2009
- The Equality Act 2010
- Anti-social Behaviour, Crime and Policing Act 2014
- Statutory guidance on the Prevent duty; Counter-Terrorism and Security Act 2015
- The Data Protection Guidance in Schools (DFE, 2024)
- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Data (Use and Access) Act 2025
- 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")
- Voyeurism (Offences) Act 2019
- The Rehabilitation of Offenders Act 1974/2020
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022
- The Public Sector Equality Duty (PSED)

Statutory guidance

- DfE (2026) 'Keeping children safe in education'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- Statutory guidance on FGM
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- DfE (2021) 'Teachers Standards'
- Early Years Foundation Stage Statutory Framework
- HM Government (2021) 'Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism'
- DfE (2026) 'Working together to improve school attendance'
- DfE (2023) Statutory Guidance on the Prevent Duty
- DfE Working Together to Safeguard Children
- DfE (2023) 'The Prevent duty: safeguarding learners vulnerable to radicalisation'
- Home Office and Foreign, Commonwealth and Development Office (2023) 'Multi-agency statutory guidance for dealing with forced marriage and multi-agency practice guidelines: Handling cases of forced marriage'
- DfE (2024) Children Missing Education
- Children's social care: national framework 2024
- Statutory framework for the Early Years Foundation Stage (2026)

Non-statutory guidance:

- DfE (2013) Use of reasonable force: Advice for headteachers, staff and governing bodies.
- DfE (2014) Promoting Fundamental British Values
- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2017) 'Child sexual exploitation'
- DfE (2018) 'Information sharing'
- DfE (2018) Promoting the Education of Looked After Children
- National Police Chief's Council (2020) 'When to call the police: guidance for schools and colleges'
- DfE (2022) 'Recruit teachers from overseas'
- Department of Health and Social Care (2022) 'Virginity testing and hymenoplasty: multi-agency guidance'
- DfE (2023) 'Meeting digital and technology standards in schools and colleges'
- DfE (2024) Sharing nudes and semi-nudes: advice for education settings working with children and young people
- Preventing Youth Violence and Gang Involvement
- Information Commissioner's Office (ICO) guide to sharing information to safeguard children and young people in the education sector in the UK
- Data Protection Toolkit

Guidance documents:

- NSPCC: http://www.nspcc.org.uk/
- Childline: http://www.childline.org.uk/pages/home.aspx
- Anti-Bullying Alliance: http://anti-bullyingalliance.org.uk/
- Beat Bullying: http://www.beatbullying.org/
- Childnet International – making the internet a great and safe place for children. Includes resources for professionals and parents http://www.childnet.com/
- Thinkuknow (includes resources for professionals and parents) https://www.thinkuknow.co.uk/
- Safer Internet Centre http://www.saferinternet.org.uk/
- Transgender http://www.mermaidsuk.org.uk/
- Shorespace Home - Shore

4. Roles and responsibilities

5.1. Trust Board

The Trust Board will:

- Ensure safeguarding and child protection, recruitment and managing allegations policies and procedures, including the staff behaviour policy (code of conduct), are consistent with statutory requirements, are reviewed annually and that the Safeguarding policy is publicly available on the UST website and by other means.
- Nominate a Trustee responsible for Safeguarding.
- Ensure that a member of the board is nominated to liaise with the LA and/or partner agencies on issues of safeguarding and child protection and in the event of allegations of abuse made against the headteacher or another governor.

5.2. Local Governing Board

The local governing board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Ensure that safeguarding and child protection underpin all aspects of school life, fostering an inclusive, anti-discriminatory culture and ensuring that the best interests of children remain paramount in all policies, procedures and decisions.

- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a link governor to monitor the effectiveness of this policy in conjunction with the full governing board.
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness at least annually. This includes:
    - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
    - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
- Make sure:
    - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
    - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
    - Ensure appropriate cyber security measures are in place to protect children's personal data, in line with recognised standards such as the Cyber Security Standards for Schools and Colleges.
    - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
    - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, trainee teachers, volunteers and contractors). Appendix 3 of this policy covers this procedure
    - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
    - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
    - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
    - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply
- The chair of governors will act as the 'case manager' if an allegation of abuse is made against the headteacher.
- All governors will read Part 1 of KCSIE in full.

5.3. Trust Executive

- Ensure a member of the Trust Executive, usually the Trust Leader, is nominated to liaise with the LA on safeguarding and child protection issues and in the event of an allegation of abuse made against the Headteacher.
- Ensure the Trust has procedures for dealing with allegations of abuse against staff (including the Headteacher), supply staff, trainee teachers, volunteers and against other children and that a referral is made to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have had they not resigned.
- Ensure enhanced DBS checks (without barred list checks, unless the governor is also a volunteer at the school) are in place for all Governors.

- Ensure the Safeguarding policy is publicly available on the school's website and by other means.

5.4. Headteacher

The headteacher 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' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- 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. Designated Safeguarding Lead

- The DSL is a member of the senior leadership team. The DSL takes lead responsibility for safeguarding and child protection in the school. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.
- During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.
- When the DSL is absent, the Deputy DSLs (DDSL) will act as cover.
- If the DSL and DDSLs are not available, an appointed individual will act as cover.
- To ensure continuity of safeguarding responsibilities, the school should implement robust cover arrangements for periods when the DSL is unavailable due to illness, leave, or other circumstances. This could, for example, include a confidential shared mailbox or equivalent system to ensure that safeguarding concerns are received, monitored, and acted upon without delay.

The DSL will be given the time, funding, training, resources and support to:

- Ensure safeguarding and child protection records are accurate, up to date, securely maintained and reviewed as required.
- Provide advice and support to other staff on child welfare and safeguarding and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service (DBS), and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school
- Act as the Prevent lead: Make sure that staff have appropriate Prevent training and induction

The DSL will also:

- Keep the headteacher informed of any issues
- Liaise with local authority case managers and designated officers for safeguarding and child protection concerns as appropriate

- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

The full responsibilities of the DSL and DDSLs are set out in their job description.

5.6. Deputy Designated Safeguarding Leads (DDSLs)

- Ensure they are trained to the same standard as the DSL and, in the absence of the DSL, carry out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of the long-term absence of the DSL the deputy will assume all the functions above.
- Ensure they carry out or contribute to tasks as directed by the DSL, for example attending a core group meeting or completing a referral form.

5.7. Policy compliance lead

- Ensure the Safeguarding Policy complies with statutory guidance

5.8. Designated policy lead

- Ensure the Safeguarding policy is publicly available on the school's website and by other means.

5.9. HR Lead

- Ensure the school operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children and disqualification by association regulations and by ensuring that there is at least one person on every recruitment panel who has completed safer recruitment training within the last 2 years.
- Ensures that the single central register is kept up to date

5.10. All Staff

All staff will:

- **Read and understand Part 1 in full of the DfE's statutory safeguarding guidance, KCSIE,** at least annually and sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- **Read the EYFS statutory framework** where children 0-5 attend school-based nurseries or reception classes
- 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 (e.g. 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
- Use CPOMS to record Safeguarding concerns

All staff will be aware of:

- Our systems that support safeguarding, including this safeguarding and child protection policy, the staff code of conduct, the role and identity of the DSL and DDSLs, the behaviour policy, the online safety policy that includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring, and the safeguarding response to children who are absent from education.
- The family and 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

- 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 and exploitation, 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)
- prejudice-based harm, including racism, faith-based prejudice and other forms of discrimination, may constitute a safeguarding concern and should be responded to in accordance with safeguarding procedures.
- 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 children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children
- 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
- Staff are allowed to bring their personal phones to school for their own use but will limit such use to non-contact time when pupils are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils. Staff will not take pictures or recordings of pupils on their personal phones or cameras. We will follow the data protection laws (Data Protection Act 2018, the UK GDPR, and the Data (Use and Access) Act 2025) when taking and storing photos and recordings for use in the school.
- Photographs taken at events and performances should not be shared publicly (e.g., on social media) without appropriate permissions.

5.11. Teachers

Teachers, including the headteacher, have a responsibility to:

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

5. Safer Recruitment

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

Our appointment process is rigorous and ensures safeguarding checks at all levels:

- Advertising which outlines the Trust's commitment to safeguarding and that all safeguarding checks will be undertaken
- Application forms
- Shortlisting process
- Candidate self-declaration
- Online applicant searches
- References and employment history
- Interview and selection
- Pre-appointment vetting checks
- Recording of outcomes and enhances DBS checks.

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

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

The appropriate DBS and suitability checks will be carried out for all governors, volunteers, contractors including those who are self-employed.

Staff suitability

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Volunteers

The school will ensure that volunteer recruitment and vetting arrangements reflect current regulated activity requirements, including changes introduced through the Crime and Policing Act 2026. In our settings which are subject to the EYFS framework, volunteers must not be permitted to begin working until the school has received the volunteer's enhanced DBS certificate including barred list information.

Ongoing suitability

Following appointment, consideration will be given to staff and volunteers' ongoing suitability to prevent the opportunity for harm to children or placing children at risk. This will be managed through our induction process.

Referral to the DBS

The school will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or they are suspended.

5.1. Single Central Record

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

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

For all other staff (apart from supply), where applicable, the SCR records the following information:

- Identity checks
- Standalone barred list checks
- Enhanced Disclosure and Barring Service (DBS) checks
- Prohibition from teaching checks (for anyone involved in planning or delivering lessons, or assessing or reporting on pupils)
- Professional qualifications checks (e.g. qualified teacher status)
- An individual's right to work in the UK checks
- Section 128 checks for those in management positions in an independent school, academy or free school. Maintained school governors should also have this check, because a section 128 direction will disqualify an individual from being a governor
- Further checks on people who have lived or worked outside the UK. These could include, where available:

- For all staff (including teaching positions): criminal records checks for overseas applicants
- For teaching positions: obtaining a letter (via the applicant) from the professional regulating authority in the country where the applicant has worked, confirming that it hasn't imposed any sanctions or restrictions on that individual, or is aware of any reason why they may be unsuitable to teach

In respect of these checks, the SCR must record:

- If the check has been carried out/certificate obtained
- Date on which each check was carried out, or the certificate obtained

For supply staff, the following is recorded:

- If they have written confirmation that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates
- The date that confirmation was received (independent schools and non-maintained special schools should also include the date on which any certificate was obtained)
- If details of any enhanced DBS certificate have been provided

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

Written confirmation that supply agencies have completed all relevant checks will also be included. The school is free to record any other information it deems relevant. The details of an individual will be removed from the SCR once they no longer work at the school.

6. Confidentiality, information sharing and record keeping

UST use CPOMS software for staff to record all and store all safeguarding and child protection concerns, including communications to and from external partners who have a safeguarding and child protection function.

Safeguarding records will be clear, factual and contemporaneous, distinguishing between observed concerns, professional judgement and historical information. Records will include the concern, actions taken, decisions reached and outcomes.

Information sharing is essential for safeguarding and promoting the welfare of children. The school will ensure that staff share concerns proactively and at the earliest opportunity with relevant parties, including safeguarding partners and local agencies, in line with established procedures.

All information will be handled in accordance with data protection legislation, ensuring it is processed lawfully, securely, and on a need-to-know basis. Staff will understand that safeguarding considerations may justify sharing information without consent where there is a clear risk to a child.

The data protection laws do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children:

- The child's safety is paramount.
- The school contributes to inter-agency safeguarding and shares information where needed.
- Staff must share information to protect children; data protection is not a barrier where there is risk of harm.
- Staff must not promise confidentiality that could compromise safety.
- Staff receive regular safeguarding updates via the DSL.
- Child protection information is confidential and shared internally on a need-to-know basis.

- Parents/carers will be informed of referrals unless this increases risk or affects an investigation; advice will be sought where needed.

The school will maintain clear arrangements for recording, storing, and transferring safeguarding information, including the timely and secure transfer of safeguarding and child protection files when pupils move settings, and, where appropriate, sharing additional relevant information to support ongoing safeguarding and risk management.

Child protection files will be transferred securely and separately from the main pupil file as soon as possible, normally within five days of an in-year transfer or within the first five days of a new term. Receipt of records will be obtained and recorded.

Where records are transferred, the school will provide a clear summary of current safeguarding concerns, relevant background information and ongoing support needs. Safeguarding information received from other settings will be reviewed promptly by the DSL or another appropriately trained member of staff to ensure risks and support needs are understood and acted upon.

Where appropriate, the DSL will liaise directly with safeguarding leads in other settings to ensure safeguarding information is fully understood and appropriate support arrangements are in place.

7. Training and support for 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 part of an ongoing programme of learning and as updates are required through email, bulletins and staff meetings.

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

The DSL and DDSLs

The DSL will undertake safeguarding and child protection 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, meeting other DSLs, 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.

The minimum training offer for all staff will be as follows:

Participants in training	Type of training	Timing / frequency	Training provider
All staff	Safeguarding Induction	On joining	DSL or DDSL
All staff	Annual update	Annually (usually September)	DSL or DDSL
All staff	Reading time for KCSIE	Annually in September	UST
All visiting staff	Reading time for school specific safeguarding information	On arrival	DSL or DDSL
Governors	Annual update	Annually (usually Autumn Term)	DSL or External Provider

5.1. Supporting our Staff

We recognise that staff working in the school who have become involved with a child who has suffered harm or appears to be likely to suffer harm may find the situation stressful and upsetting.
We will support such staff by providing an opportunity to talk through their anxieties with the DSLs and to seek further support as appropriate.

8. Transparency for parents

KCSIE continues to highlight the school's role in protecting children from abuse. Tower Hamlets Local Authority suggests that schools include the following statement for parents/carers, and we believe it is of relevance to all our schools.

All schools have a clear responsibility placed on them by the Children Act 1989 and by guidance from the Department for Education to safeguard the welfare of all their pupils. In doing so, schools are expected to consult with Children's Social Care if they believe there is a possibility that a child may be suffering from abuse or neglect. A referral to Children's Social Care is not intended to be an accusation of any particular action or against any person. It is the reporting of concerns which have come to the school's attention. This is in accordance with Tower Hamlets Local Safeguarding partnership procedures.

UST has a Safeguarding Policy which covers all its schools, and this refers to Local Safeguarding partnership procedures. School and Local Authority documents are publicly available and can be consulted by parents/carers. Any one of the Designated Safeguarding Officers will be happy to discuss any questions or concerns parents/carers may have about Child Protection practice.

9. Complaints and concerns about school safeguarding

Complaints against staff that are likely to require a safeguarding and child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff. Other complaints relating to safeguarding would be addressed under our normal complaints procedure – see the school Complaints Policy.

10. 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, about the management of safeguarding and child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the school's safeguarding arrangements. If it becomes necessary to consult outside the school, they should speak in the first instance, to the LADO following the UST Whistleblowing Policy.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk

Whistleblowing re. the Headteacher should be made to Trust Leader.

Appendix Part 1: Key members of staff referenced

1. Key school and Local Authority contacts

Canary Wharf Secondary	
Designated Safeguarding Lead	Geoff Roberts
Teacher for Looked After Children	Nehar Begum
Headteacher	Geoff Roberts
Chair of Governors	John Afolayan
Safeguarding Governor	Margaret Raggett

Canary Wharf Primary, East Ferry	
Designated Safeguarding Lead	Melisa Akis
Teacher for Looked After Children	Melisa Akis
Headteacher	Melisa Akis
Chair of Governors	John Afolayan
Safeguarding Governor	Margaret Raggett

Canary Wharf Primary, Glenworth	
Designated Safeguarding Lead	Shireen Sinem
Teacher for Looked After Children	ShireenSinem
Headteacher	Shireen Sinem
Chair of Governors	John Afolayan
Safeguarding Governor	Margaret Raggett

Cyril Jackson Primary School	
Designated Safeguarding Lead	Hodo Dirir
Teacher for Looked After Children	Hodo Dirir
Headteacher	Hodo Dirir
Head of School	Maryum Qureshi
Chair of Governors	Sue Stollery
Safeguarding Governor	Sue Stollery

Royal Greenwich Trust School	
Designated Safeguarding Lead	Justice Asafo Adjei Jnr
Teacher for Looked After Children	Pamela Adodo
Executive Headteacher	Cath Smith
Head of School	Asma Khan
Chair of Governors	Simon Hall
Safeguarding Governor	Jacqueline Chan

Sir William Burrough	
Designated Safeguarding Lead	David Ash
Teacher for Looked After Children	David Ash
Executive Headteacher	Siobhan Fehim
Head of School	David Hodges
Chair of Governors	Ross Tranter
Safeguarding Governor	Ross Tranter

St Paul's Way Primary School	
Designated Safeguarding Lead	David Ash
Teacher for Looked After Children	David Ash
Executive Headteacher	Siobhan Fehim
Head of School	Karyce Maitland
Chair of Governors	Joe Hall
Safeguarding Governor	James Baily

St Paul's Way Secondary School	
Designated Safeguarding Lead	Owen Williams
Teacher for Looked After Children	Emma McCay
Executive Headteacher	Cath Smith
Head of school	Firdusi Uddin
Chair of Governors	Joe Hall
Safeguarding Governor	James Baily

Local Authority Contacts

London Borough of Tower Hamlets	
MAST Multi-Agency Support Team	020 7364 3444 / 5601 / 5606 / 5358 / 7796 / 3342 / 7828 / 6469 / 3181 Email the LBTH MAST Request for support form following verbal discussion : MAST@towerhamlets.gov.uk
Children's Social Care Emergency Out of Hours Duty Team (5.00pm onwards)	020 7364 4079
Family and early help Hub	020 7364 5006
LADO	0207 364 0677 07903 238827 LADO@towerhamlets.gov.uk

Royal Borough of Greenwich	
MASH	**Duty Team**: 020 8921 3172 **Consultation line for professionals**: 020 8921 2267 MASH-referrals@royalgreenwich.gov.uk *(secure email e.g. Egress)* MASH-referrals@royalgreenwich.gov.uk.cjsm.net
MASH Out of Hours	020 8854 8888
Family and early help Hub	020 8921 3172 (Same email address as above)
LADO	020 8921 3930 childrens-LADO@royalgreenwich.gov.uk

Link to .gov website to provide details of MASH/MAST in a different local authority:
https://www.gov.uk/report-child-abuse-to-local-council

Appendix Part 2: Procedures and Processes for all staff

2. Recognising abuse and taking action

All staff working with children should maintain an attitude of 'it could happen here'. Where staff have a concern, they should follow this policy and speak to the DSL or Deputy DSL. A write up of the concern should be recorded on CPOMS, which UST uses as a Trust wide system to record Safeguarding concerns.

At that point, a decision will be made to:

- manage any support for the child internally via the school's own pastoral support processes, including considering where doing so does not place the child at additional risk, whether the designated safeguarding lead (or a deputy) should inform parents or carers to further support the child's wellbeing,
- undertaking a family help assessment, or
- making a referral to statutory services, for example as the child could be in need, is in need or is suffering, or likely to suffer harm.

Staff shall be alert to the potential need for family and early help in particular for a child who:

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

2.1. If a child is suffering or likely to suffer harm, or in immediate danger

The DSL or Deputy DSL should normally be available to discuss safeguarding concerns. In exceptional circumstances, this should not delay action being taken. Staff should consider speaking to a member of the school Senior Leadership Team and/or take advice from LA social care. If staff make a referral to local authority children's social care and/or the police immediately if they believe a child is suffering or likely to suffer from harm or is in immediate danger, they should inform the DSL as soon as is practically possible. Anyone can make a referral.

This is the link to the GOV.UK webpage for reporting child abuse to your local council: https://www.gov.uk/report-child-abuse-to-local-council

2.2. 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. Ensure that this is recorded on the school's CPOMS system which UTS uses Trust wide.
- Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly, 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.

2.3. If you discover that FGM has taken place or a pupil is at risk of FGM

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 or discovers that a pupil **aged 18 or over** appears to have been a victim of FGM should speak to the DSL and follow the local safeguarding procedures.

2.4. 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)

Where possible, speak to the DSL first.
If in exceptional circumstances the 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 local authority children's social care. Share details of any actions you take with the DSL as soon as practically possible.
Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

2.5. Family and early help assessment

Family and early help means providing support as soon as a problem emerges, at any point in a child's life. Any pupil may benefit from family and early help. Staff will be alert to the potential need for family and early help for pupils who show these indicators:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory EHCP)
- 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 showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
- is at risk of being radicalised into terrorism
- has a parent or carer in custody, or is affected by parental offending
- 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 alcohol and other drugs themselves
- is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage, and
- is a privately fostered child.

If a family and early help assessment is appropriate, and they do not require the support of statutory children's services the DSL (or a deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in a family and 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.

Any such cases should be kept under constant review and consideration given to a referral to local authority children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse. Alternatively, qualified lead practitioners (i.e. not a social worker) who may lead assessments before statutory intervention can continue to lead work with families up to and including Section 17.

Referrals

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

2.6. Pupil groups potentially at greater risk of harm

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

Pupils who need social workers

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

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

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

Home-educated children

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

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

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

Looked After Children (LAC) and Previously Looked After Children (PLAC)

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

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

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

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

The designated teacher for looked after children works with the virtual school head to discuss how Pupil funding can be best used to support the progress of looked after children in the school and meet the needs in the child's personal education plan. The designated teacher will follow the statutory guidance Promoting the Education of Looked After Children.

The school will work with local authorities to support care leavers, liaising with allocated Personal Advisors where necessary to address any concerns. The school will also identify and support young carers, recognising the potential impact of caring responsibilities on their wellbeing, attendance and attainment, and will ensure timely access to appropriate support services.

Pupils with SEND and medical conditions

Children with SEND or certain medical conditions may face additional safeguarding vulnerabilities. The school will ensure these risks are recognised and addressed through a vigilant and inclusive safeguarding approach, with close liaison between the DSL and SENCO where concerns arise, and appropriate pastoral and communication support in place.

These additional challenges may include:

- Assumptions that indicators of harm relate to a child's condition
- Increased risk of isolation, bullying, or prejudice-based abuse
- Reduced ability to recognise, understand, or report abuse
- Communication barriers
- Greater dependence on adults for care, including intimate care
- Increased vulnerability online, including difficulty distinguishing fact from fiction

The school will take these factors into account when identifying, responding to, and supporting children with SEND.

A child having a medical condition is not, in itself, an indicator of increased safeguarding risk. However, in the event of a clinical incident, the healthcare professional and DSL will consider whether any safeguarding concerns are present and take appropriate action where required. Further guidance is available here.

LGBTQ+ pupils

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

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

Children who are questioning their gender

The school recognises that some children may question their gender and will respond appropriately where this is raised by the child or their parents. Staff will take a supportive and professional approach, seeking to understand the child's views and experiences, while remaining mindful that such feelings may change over time.

The school will be alert to potential vulnerabilities, including mental health needs and the risk of bullying or discrimination, and will ensure appropriate safeguarding and pastoral support is in place. In addition, the school will promote an inclusive environment by avoiding rigid gender stereotypes and supporting flexibility across school life.

Bullying negatively impacts children's mental health, wellbeing and attainment; therefore, all forms are unacceptable, and schools must address concerns promptly to prevent escalation.

Considering requests for support with social transition

The school will not initiate actions relating to social transition; any response will only occur where requested by a child or their parents. Decisions will be made on a case-by-case basis, with a clear, recorded process that prioritises the safeguarding, welfare, and best interests of the child and others.

Parents or carers will normally be involved and their views given appropriate weight, unless this would place the child at risk, in which case the DSL will determine appropriate action. The school will take a cautious and evidence-informed approach, recognising that social transition is a significant intervention and that children's views and needs may change over time.

All decisions will take account of safeguarding duties, relevant professional advice, and legal obligations under the Equality Act 2010 and Human Rights Act 1998, while ensuring a balanced consideration of the needs and rights of all pupils.

Boundaries and Expectations

The school will ensure that any support related to social transition does not include access to single-sex facilities (such as toilets, changing rooms, or residential accommodation) or participation in single-sex activities, such as PE, where safety considerations apply. These boundaries will be clearly and sensitively explained to pupils and families.

The school will take a firm stance against bullying or harassment while also respecting the rights of pupils and staff in relation to religion or belief. Where appropriate, practical arrangements (such as the use of names rather than pronouns) may be considered to support a respectful environment.

Review and Oversight

Decisions relating to social transition will be regularly reviewed to ensure they remain appropriate, particularly where circumstances change. The DSL will be involved in any review, and parents will be engaged where appropriate.

The school will ensure that all records accurately reflect a child's biological sex, and that relevant staff are informed where necessary to support safeguarding responsibilities.

Additional Vulnerabilities

The school will be mindful of the particular vulnerabilities of pupils who may be 'living in stealth' and will ensure appropriate safeguarding oversight through the DSL.

Ongoing Support and Flexibility

The school will maintain a flexible approach, including supporting pupils who wish to reconsider or reverse earlier decisions, working closely with parents and relevant professionals to ensure appropriate care and support.

Pupils requiring mental health support

All staff should be aware that mental health problems 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.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If a child

is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise.

These could include:

- significant changes in behaviour
- ongoing difficulty sleeping
- withdrawing from social situations
- not wanting to do things they usually like, and
- physical signs of self-harm or neglecting themselves.

Not every child who exhibits these behaviours is suicidal or has a mental health concern. However, education staff are well placed to identify these and other potential warning signs. In doing so they can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital early intervention.

If staff have a concern about a child's mental health that is also a safeguarding concern, they should follow the school's safeguarding procedures and speak to their designated safeguarding lead or deputy. If staff feel that a child is in danger, they should call 999 or take them to A&E immediately. If a 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.

Where available, staff should utilise Mental Health Support Teams (MHSTs) to provide early intervention, support whole-school mental health approaches, and access timely advice and external services for pupils.

3. Concerns about a staff member, trainee teacher, 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, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the Trust Leader. Where allegations are made against the Trust Leader, this should be reported to the Chair of the Trust.

The headteacher/Trust Leader will then follow the procedures set out in the appendix, if 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, volunteer or contractor) to the headteacher, 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.

School culture

The school understands that spotting the early signs of harmful behaviour towards children can be difficult, and that many will be hesitant to report concerns they have about their colleagues' behaviour, particularly the behaviour of their superiors. Staff are encouraged to maintain an attitude that recognises that abuse can happen anywhere, in any setting.

The school will ensure that all staff members have received training as part of their induction that outlines appropriate behaviour towards pupils for staff members.

The school will work to foster an environment where personal and professional boundaries are clearly set and respected for all individuals in the school community, e.g. pupils are not treated as friends and an appropriate professional distance is maintained by staff.

Evaluating school culture following concerns

The school will ensure that appropriate consideration is given to the school's culture and whether or not it has enabled the inappropriate behaviour to occur. The headteacher will review whether any changes need to be made to relevant policies or training programmes considering any evaluations of the school's culture, to achieve an open and transparent culture that deals with all concerns promptly and appropriately.

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4.1 Abuse, Neglect & Exploitation

KCSIE is very clear about the indicators of abuse:

Abuse a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

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

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

Sexual abuse involves forcing, causing or inciting a child 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, such as acts of penetration, whether that is with part of a person's body or an object (e.g. rape or assault by penetration), and non-penetrative acts such as masturbation, kissing, rubbing, and touching over clothing. Sexual abuse may also include non contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online as well as offline, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it.

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

All staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse - including physical, sexual, emotional abuse, and stalking), criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual

sharing of nudes or semi-nudes, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

4.2 Domestic Abuse

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

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

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

Domestic abuse can occur within pupil's own intimate relationships. This is known as teenage relationship abuse.

Operation Encompass

Operation Encompass is a national information-sharing scheme that enables police to notify schools and colleges when they attend a domestic abuse incident involving a child. The aim is to ensure educational settings can provide timely and appropriate support to children affected by domestic abuse.

Children are recognised as victims, whether they witness the incident, hear it, experience its effects, or are connected to the household where it occurred. Notifications are usually shared with the Designated Safeguarding Lead (DSL), who is responsible for assessing needs, maintaining confidentiality, and taking any necessary safeguarding action.

Operation Encompass complements existing safeguarding procedures and does not replace referrals to children's social care where concerns about a child's welfare exist. All information shared must be handled securely and in accordance with data protection legislation.

4.3 Homelessness

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

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

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

4.4 Online Safety

The school will adhere to the Online Safety Policy.

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.
To address this, our school will:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors which are reviewed for effectiveness annually.
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Be mobile phone-free environments by default; anything other than this should be by exception only.
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories
- **contact:** being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes or semi-nudes, sharing other explicit images and online bullying
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group.

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

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

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

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

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

Online abuse and cyber bullying

This involves the use of technology and the internet to harass, threaten or intimidate another child. Instances of online abuse will be managed in line with this policy, the Online Safety Policy and the Anti-bullying Policy.

Discriminatory behaviour encompasses abuse inflicted on a pupil because of their protected characteristics, e.g. religion, ethnicity, gender, sexual orientation, culture, or any SEND. Discriminatory behaviour is never acceptable, and all cases will be handled in line with this policy and the safeguarding and child protection Policy.

The Public Sector Equality Duty (PSED) requires schools and colleges to give due regard, in all aspects of their work, to eliminating discrimination, harassment and victimisation, advancing equality of opportunity, and fostering positive relationships between those with and without protected characteristics. This duty applies to all protected characteristics and means that equality considerations must be explicitly factored into decision-making and policy development, including addressing issues such as sexual harassment, misogyny, racism and faith-based prejudice. As a result, robust recording and monitoring of incidents is essential to identify patterns and ensure effective action is taken.

Intimate partner abuse involves a romantic partnership between children in which one or both partners are emotionally, physically or sexually abusive to the other (sometimes known as 'teenage relationship abuse'). This could include:

- Repetitive insults.
- Controlling behaviour, e.g. preventing a child from socialising with others or deliberately isolating them from sources of support.
- Sexual harassment.
- Threats of physical or sexual abuse.

The school will manage intimate partner abuse in the same way as a case of abuse between any other children, i.e. via the processes outlined in the Handling allegations of abuse against pupils section of this policy, and in line with the Child Protection and Safeguarding Policy.

Communicating with parents

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

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

Reviewing online safety

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

Cybercrime

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

Cyber-dependent crimes include:

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

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme.

Additional advice: 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK.

Upskirting

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting. "Operating equipment" includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion-activated camera.
Upskirting will not be tolerated by the school. Any incidents of upskirting will be reported to the DSL, who will then decide on the next steps to take, which may include police involvement.

Artificial intelligence (AI)

AI describes computer systems and software that can perform tasks that ordinarily require human intelligence, such as decision-making and the creation of images. These tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Copilot.

UST recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

UST will treat any use of AI to access harmful content or bully pupils in line with this policy.

Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the school. Our school's requirements for filtering and monitoring also apply to the use of AI, in line with KCSIE.

Mobile phones

All schools are committed to maintaining a mobile phone-free learning environment. In line with government guidance, pupils will not have access to mobile phones during the school day, including during lessons, between lessons, at breaktimes, and at lunchtime. Any exceptions to this policy will be considered on an individual basis where there is a clear and justifiable need.

4.5 Anti-Bullying

Each school in our Trust has its policy on anti-bullying set out in a separate document and acknowledge that to allow or condone bullying may lead to consideration under safeguarding and child protection procedures. This includes all forms e.g. cyber, racist, homophobic and gender related bullying. We keep a record of known bullying incidents which are shared with and analysed by each local governing body. All staff are aware that children with SEND and / or differences/perceived differences are more susceptible to being bullied / victims of child abuse.

If the bullying is particularly serious, or the anti-bullying procedures are seen to be ineffective, the Headteacher and the DSL will consider implementing child protection procedures.

The subject of bullying is addressed through our RSHE and character development curriculum.

4.6 Racist Incidents

Repeated racist incidents or a single serious incident may lead to consideration under safeguarding and child protection procedures. We keep a record of racist incidents and report them to the Local Authority. Racist incidents will usually be dealt with under our Behaviour Management Policy.

4.7 The Prevent Duty and Channel

The Statutory Guidance on the Prevent Duty (2023) and the 'The Prevent duty: safeguarding learners vulnerable to radicalisation' DfE (2023) places a duty on education and other children's services to have due regard to the need to prevent people from becoming terrorists or supporting terrorism.

Children may be susceptible to extremist ideology and radicalisation. Protecting children from this risk is part of the Trust's safeguarding approach.

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

Radicalisation – is defined as the process of a person legitimising support for, or use of, terrorist violence

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

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

School staff receive training to help identify early signs of radicalisation and extremism. Indicators of vulnerability to radicalisation are in detailed in the Appendix.

Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the school follows the DfE advice Promoting Fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Schools (2014).

The school governors, the Headteacher and the Designated Safeguarding Lead (DSL) will assess the level of risk within the school and put actions in place to reduce that risk. A comprehensive Prevent Risk Assessment, specific to the school (template in the Appendix) will be drawn up and reviewed regularly.

Visitors and speakers coming into the school will be vetted prior to them having access to pupils. Due diligence checks will also be carried out on those hiring and using the school premises,

The school will incorporate appropriate filtering and monitoring systems to limit pupils' exposure to online risks, including extremist content. The DSL and ICT team will work together to ensure that there is a clear reporting process in place where filtering systems raise safeguarding or prevent-related concerns.

When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL. If the matter is urgent then Police must be contacted. The DfE has also set up a dedicated telephone helpline to raise concerns around Prevent (020 7340 7264).

Prevent referrals may also be passed to multi-agency "Channel Panel" which will discuss the individual referred to determine whether they are vulnerable to becoming terrorists or supporting terrorism and consider the appropriate support required. Further training can be accessed here.

4.8 Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

The National Referral Mechanism (NRM) is the UK's framework for identifying and supporting potential victims of modern slavery and human trafficking. Where appropriate, the DSL will consider referrals in accordance with statutory guidance.

Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or 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 and/or through violence or the threat of violence.

Vulnerability to exploitation may be increased by factors including disability, SEND, neurodivergence, communication difficulties, sexual identity, cognitive ability, social status and access to economic or other resources.

This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. Children may be exploited by adults or by other children. Where a child is identified as causing harm to another child, consideration will be given to whether they are also a victim of exploitation.

CCE and CSE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery, and further information is available in the Modern Slavery statutory guidance. In accordance with KCSIE, a relevant child protection and modern slavery referral should be completed where a potential victim of CCE or CSE is identified.

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

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. Children who are criminally exploited should have their vulnerabilities recognised by adults and professionals, (particularly older children), and should be treated as victims. It is not possible for a child to give informed consent to engage in criminal or other exploitative activity, and they cannot give consent to be exploited, abused or trafficked.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Some children who have been trafficked may be supported by an Independent Child Trafficking Guardian (ICTG), who provides advocacy and promotes recovery.

Where CCE, or the risk of it, is suspected, staff will discuss the case with the DSL who will take appropriate action. Indicators of CCE can be found below.

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

enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media.

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. This can be committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship. As with CCE, victims are not always recognised and can be criminalised for actions they take whilst under coercion. This remains a significant concern, as professionals continue to encounter cases where children are manipulated, groomed, and exploited without fully understanding the abuse they are experiencing.

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL who will take appropriate action. Shared indicators of both CCE and CSE include:

- Unexplained gifts, money or possessions
- Association with exploited children
- Changes in emotional wellbeing
- Drug or alcohol misuse
- Missing episodes
- Returning home late
- Poor attendance or disengagement from education
- Older boyfriends or girlfriends
- Sexually transmitted infections
- Pregnancy
- Sexualised behaviour beyond expected development

Children affected by exploitation may require additional safeguarding, pastoral and educational support to help them remain safe and engaged in education.

4.9 County lines

As county lines is a form of criminal exploitation, a First Responder who identifies any potential victim of county lines exploitation should complete the relevant safeguarding and child protection and modern slavery referrals as detailed in the Modern Slavery statutory guidance.

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

Children can be targeted and recruited into county lines in several locations and all types of educational establishment. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. A number of the indicators for CCE and CSE may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing (from school or home) and are subsequently found in areas away from their home
- have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime)

- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
- are found in accommodation that they have no connection with, often called a 'trap house' or 'cuckooing' or hotel room where there is drug activity
- owe a 'debt bond' to their exploiters, and
- have their bank accounts used to facilitate drug dealing.

CSE, CCE and County Lines indicator matrix

This is not an exhaustive list of the indicators of Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE) or County Lines. Practitioners should be aware that many of the indicators might be common to more than one form of exploitation – signalled by the unshaded boxes. This is because the driving forces behind different forms of exploitation are often similar, and the same grooming models used to coerce, intimidate and abuse children for sexual and criminal exploitation, for example, are also liable to be used to groom individuals for County Lines.

Underage sexual activity	Inappropriate sexual or sexualised behaviour beyond developmental norms	Sexually risky behaviour / 'swapping' sex		Regular school absence, truanting, or coming home late	Receiving unexplained money, gifts or gifts from unknown sources	Involvement in crime, police involvement
Older boyfriends or girlfriends	**Child Sexual Exploitation**	Repeated STIs	Changes in emotional wellbeing	Gangs, gang fights, gang membership, criminal networks	**Child Criminal Exploitation**	Having unaffordable new things or expensive habits
Changes in the way they dress	Youth-produced sexual imagery (etc)	In girls, repeated pregnancy, abortions, miscarriage	Not taking part in education	Hanging out with groups of older people, anti-social groups or other vulnerable peers	Involved in abusive relationships, intimidated and fearful	Drug or alcohol misuse
Sexual behaviour beyond expected developmental norms	Disengagement from education	Changes in emotional wellbeing	Association with other children involved in exploitation	Regularly coming home late	Unexplained injuries/signs of assault	
Seen at known places of concern	Recruiting other people to exploitative situations	Moving around the country, appearing in new places, not knowing where they are	**County Lines**	Fear, intimidation, debt bondage	Going to hotels or other unusual locations to meet friends	Being controlled by others.
Getting in / out of cars driven by unknown adults	Having multiple mobile phones and worrying about losing contact	Contact with known perpetrators	Carrying weapons	Unexplained money	Going missing from home or school	

Modern Slavery

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

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

4.10 Forced Marriage

Forced marriage is a form of abuse and a criminal offence. It occurs when one or both people are pressured, threatened, deceived, or otherwise coerced into a marriage without their full and free consent. Force may be physical, emotional, psychological, sexual, financial, or involve intimidation and control. A marriage may also be considered forced where a person lacks the capacity to consent. It is illegal to cause a child under the age of 18 to marry, including in non-legally binding or unofficial ceremonies.

Staff should be alert to signs that a child may be at risk of forced marriage, including:

- Persistent or unexplained absence from school.
- Extended visits abroad or failure to return from holidays.
- Anxiety about forthcoming school holidays or overseas travel.
- Being monitored or controlled by family members.
- Withdrawal from education, extracurricular activities, or friendship groups.
- Sudden decline in attendance, behaviour, engagement, attainment, or aspirations.
- Announcement of an engagement, particularly to an unknown individual.
- Family history of forced marriage.
- Restrictions on further or higher education opportunities.
- Signs of poor mental health, including depression, anxiety, self-harm, or eating disorders.
- Concerns that a child is being withdrawn from education or isolated from support networks.

Any member of staff who has concerns that a child may be at risk of, or has experienced, forced marriage must report their concerns immediately to the DSL or a deputy DSL.
The DSL will:

- Speak with the child privately and take all concerns seriously.
- Follow local safeguarding procedures, including referrals to Children's Social Care, the police, or the Forced Marriage Unit where appropriate.
- Seek advice from the Forced Marriage Unit as required.
- Ensure appropriate support, safety planning, and pastoral care are provided.
- Consider the child's mental health and wellbeing and make additional referrals where necessary.

Staff must **not** approach parents, family members, community representatives, or others connected to the child about concerns of forced marriage, as this may place the child at increased risk of harm.
The school will support victims by working with relevant agencies, providing safeguarding and emotional support, and helping children access appropriate advice, legal protection, and specialist services.

4.11 Honour-Based Abuse (HBA)

Honour based violence (HBA) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. HBA is a form of abuse. Such abuse can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

Honour based abuse might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion;
- want to get out of an arranged marriage;
- want to get out of a forced marriage;
- wear clothes or take part in activities that might not be considered traditional within a particular culture.

It is a violation of human rights and may be a form of domestic and/or sexual abuse.

4.12 Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is a form of child abuse and violence against women and girls. It involves procedures that intentionally alter, injure, or remove part or all of the external female genitalia for non-medical reasons. FGM is illegal in the UK under the Female Genital Mutilation Act 2003 and is recognised as a form of so-called honour-based abuse (HBA).

FGM can have serious lifelong physical, emotional and psychological consequences. All staff should be aware that children at risk of FGM may also be at risk of other forms of abuse, including forced marriage and wider honour-based abuse.

Staff should be alert to indicators that a child may be at risk of, or have undergone, FGM, including:

- A family history of FGM.
- Coming from a community where FGM is known to be practised.
- A sibling or close relative having undergone FGM.
- Discussion of a forthcoming special ceremony, celebration or rite of passage.
- Plans for extended travel to a country where FGM is prevalent.
- A visit from an older female relative from overseas.
- Withdrawal from PSHE, RSE or other educational activities.

Indicators that FGM may be imminent:

- A child discloses that they are going to have a "special procedure" or are preparing to "become a woman".
- A child expresses concern that they may be at risk.
- Family members discussing a lengthy trip abroad.

Indicators that FGM may have taken place:

- Prolonged or unexplained absence from school.
- Significant behavioural changes following a holiday abroad.
- Difficulty walking, sitting or participating in physical activity.
- Complaints of pain, discomfort or injury in the genital area.
- Recurrent urinary, bladder or menstrual problems.
- Spending unusually long periods in the toilet.
- Withdrawal, secrecy, anxiety or reluctance to discuss concerns.
- Disclosure by the child or another person.

Any member of staff who has concerns that a child may be at risk of FGM must report these concerns immediately to the DSL or deputy DSL, who will follow local safeguarding procedures and make referrals to Children's Social Care as appropriate.

Mandatory Reporting Duty for Teachers

Where a teacher is informed by a child under 18 that FGM has been carried out, or observes physical signs that indicate FGM appears to have been carried out, they must make a personal report to the police. This is a statutory duty. The teacher should also inform the DSL, unless there is a good reason not to do so.

For suspected or at-risk cases, staff should report concerns to the DSL, who will assess risk and make appropriate referrals.

UST follows the **"One Chance" Rule**, recognising that there may only be one opportunity to protect a child. Concerns about FGM will therefore be acted upon immediately and without delay. Appropriate safeguarding, pastoral and emotional support will be provided to any child affected by, or at risk of, FGM.

4.13 Virginity testing and hymenoplasty

Virginity testing and hymenoplasty are illegal under the Health and Care Act 2022 and are forms of abuse associated with so-called honour-based abuse (HBA), forced marriage, and coercive family or community control. Virginity testing involves any examination intended to determine whether a person has had sexual

intercourse, while hymenoplasty is a procedure intended to reconstruct the hymen. Both practices can cause significant physical and psychological harm.

Staff should be alert to concerns that a child may be at risk of, or subjected to, virginity testing or hymenoplasty, including:

- Requests for help or disclosures about either procedure.
- Family concerns about relationships, marriage, or family honour.
- Family history of honour-based abuse, forced marriage, or similar practices.
- Pain, discomfort, or unexplained physical symptoms.
- Fear of family members or controlling behaviour within the home.
- Signs of trauma, anxiety, depression, self-harm, or withdrawal.
- Unexplained absences from school, particularly linked to overseas travel.
- Deterioration in attendance, behaviour, wellbeing, or educational performance.
- Previous or current safeguarding concerns relating to abuse, coercion, or control.

Any concerns must be reported immediately to the DSL or deputy DSL.
The DSL will:

- Assess the level of risk and take appropriate safeguarding action.
- Speak with the child sensitively and privately.
- Follow local safeguarding procedures, including referrals to Children's Social Care and/or the police where appropriate.
- Ensure the child receives appropriate safeguarding, pastoral, and mental health support.
-

Staff must **not** contact family members, community leaders, or attempt mediation, as this may increase the risk of harm to the child. Where there is an immediate risk of harm, the police will be contacted without delay. The school will promote awareness of these harmful practices and provide a safe environment for children to seek help and disclose concerns.

4.14 Child Abduction and Community Safety Incidents

For the purposes of this policy, "child abduction" is define as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.
All staff will be alert to community safety incidents taking place in the vicinity of the school that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with pupils.

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

4.15 Child-on-Child abuse (including harassment and violence)

All staff should be aware that children can abuse other children (**child-on-child abuse),** and that it can happen both inside and outside of school, and online. All staff will be aware of the indicators of Child-on-Child abuse, how to identify it, how prevent it and how to respond where they believe a child may be at risk from it.

All staff will also recognise that even if no cases have been reported, this is not an indicator that Child-on-Child abuse is not occurring. All staff will speak to the DSL if they have any concerns about Child-on-Child abuse. Staff should be alert to when children might be at highest risk around the school day (for example immediately after school).

All staff should understand the importance of challenging inappropriate behaviours between children that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviour, misogyny, violence against women and girls (VAWG) an unsafe environment for children and in

worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

All staff should be aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator.

As well as knowing how to respond to concerns, all staff should know that child-on-child abuse is preventable. All staff should know that timely, evidence- based support can be key to preventing children from going on to commit abuse or violence.

The school will ensure that wider societal factors that exacerbate the problem of child-on-child abuse are reflected in its approach to creating a preventative culture. This means that individuals who are more likely to be abused, or who are at increased risk of acting as a perpetrator in abusive situations, are given additional support from an early stage. The school will have a clear set of values and standards that will be upheld and demonstrated throughout all aspects of school life and will be underpinned by the school's policies, procedures and curriculum.

Child-on-Child abuse can be manifested in many different ways, including but not limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice based incidents,
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- serious physical assault and harm, or the threat of harm with a weapon
- sexual violence such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nudes or semi-nudes
- upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

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

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

Curriculum

Schools play a crucial role in preventative education. Preventative education is most effective in the context of a whole-school approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, VAWG, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. The

school/college will have a clear set of values and standards, upheld and demonstrated throughout all aspects of school/college life.

These will be underpinned by the school's behaviour policy and pastoral support system, as well as by a planned programme of evidence based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum in an age-appropriate way.

This programme will tackle, at an age-appropriate stage, issues such as:

- supporting children to develop the skills that form the building blocks of all positive relationships
- healthy and respectful relationships
- boundaries, consent and kindness in relationships
- stereotyping, prejudice and equality
- body confidence and self-esteem
- how to recognise and report concerns about an abusive relationship, including coercive and controlling behaviour
- concepts of, and laws relating to – all forms of sexual harassment, and abuse, and how to access support
- what constitutes sexual harassment and sexual violence and why these are always unacceptable, emphasising that it is never the fault of the person experiencing it, and
- understanding online harms such as sharing images, the prevalence of deepfakes, pornography and misogynistic influencers, including incels and when and where to seek help.

4.16 Child-on-child sexual harassment and sexual violence

Harmful sexual behaviour (HSB) can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can occur also through a group of children towards a single child or towards another group of children. 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.

Early intervention in inappropriate behaviour such as misogyny can help to prevent escalation to more serious abuse such as sexual harassment and sexual violence. Children who display HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

All staff should be aware of the importance of:

- making clear that there is a **zero-tolerance approach** to sexual harassment and sexual violence; that it is never acceptable, and it will not be tolerated. It should never be passed off as "banter", "just having a laugh", "a part of growing up" or "boys being boys". Failure to do so can lead to a culture of unacceptable behaviour, misogyny, VAWG, an unsafe environment and in worst case scenarios, a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it,
- recognising, acknowledging, and understanding the scale of HSB, sexual harassment and sexual violence and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported,
- recognising the escalatory nature of misogyny and VAWG and the benefits of early identification to support their approach to minimising the risk of HSB, sexual harassment and sexual violence, and
- challenging 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.

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

Whilst any report of HSB, sexual harassment or sexual violence should be taken seriously, staff should be aware it is more likely girls will be the victims of sexual harassment and sexual violence and more likely it will be perpetrated by boys.

Children with disabilities are also three times more likely to be abused than their peers. Ultimately, it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

Sexual harassment

Sexual harassment refers to 'unwanted conduct of a sexual nature' which can occur both online and offline and inside and outside of school or college. In this context it specifically relates to child-on-child sexual harassment. Such behaviour can:

- violate a child's dignity,
- make them feel intimidated, degraded or humiliated, and
- create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, examples of sexual harassment can include:

- sexual "jokes" or taunting,
- sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothing or appearance and using sexualised names,
- physical behaviour, such as deliberately brushing against someone, or interfering with someone's clothes. Schools and colleges should assess when such behaviour crosses into sexual violence – it is important to talk to and consider the experience of the victim,
- displaying pictures, photos or drawings of a sexual nature,
- upskirting (this is a criminal offence), and
- online sexual harassment, which may occur independently, or as a broader pattern of sexual harassment and/or sexual violence. This may include:
    - consensual and non-consensual sharing of nudes or semi-nudes. Taking and sharing nude photographs (including those generated using AI e.g. deepfakes) of those aged under 18 is a criminal offence.
    - sharing of unwanted explicit content
    - sexualised online bullying
    - unwanted sexual comments and messages, including, on social media
    - sexual exploitation; coercion and threats, and
    - coercing others into sharing images of themselves or performing acts they're not comfortable with online.

If left unchallenged, it can foster a culture that normalises inappropriate behaviour and increases the risk of leading to sexual violence.

Sexual Violence

All staff should be aware that child-on-child sexual violence can and does occur, both inside and outside school.

Sexual offences are defined in the Sexual Offences Act (2003) as:

- Rape
- Assault by penetration
- Sexual Assault
- Causing someone to engage in sexual activity without consent

All staff should be aware of the need for swift reporting to the DSL. This may result, after a referral to LA social care to work with both the LA social care and the police. All reports will be dealt with seriously and swiftly.

In any disclosure, the process described in this policy should be observed.

Following a report of sexual violence, the DSL (or a deputy) should carry out an immediate risk and needs assessment. For a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment for a report of sexual violence should consider:

- the victim's safety and support needs
- potential other victims
- the alleged perpetrator(s)
- the wider school or college community, including staff and students, and any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms, and
- the location and time of the incident, with steps to improve safety in that area.

Decisions about shared classes, proximity on site, sharing school premises, should be considered immediately.

4.17 Serious Violence

Serious violence is a safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the designated safeguarding lead (or a deputy), who will assess the risk and take appropriate action. Where relevant this will include any action needed to de-escalate peer conflict.

Schools play a key role in protecting children from violence, safeguarding victims, as well as those who may be at risk of, or are involved in violence (who may also be victims themselves). Staff should be alert to signs that a child may be at risk of or involved in serious violence. These risks are higher for children with disrupted education (e.g. suspensions, permanent exclusions, time in alternative provision) or a history of offending. Schools should also try to be alert to when children might be at highest risk when travelling to or from school.

Staff should be aware of the indicators which may signal a pupil is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- Increased absence from school
- A change in friendships
- Relationships with older individuals or groups
- A significant decline in academic performance
- Signs of self-harm
- A significant change in wellbeing
- Signs of assault
- Unexplained injuries
- Unexplained gifts or new possessions

The most significant risk factors that could increase a pupil's vulnerability to becoming involved in serious violence include, but are not limited to:

- being male,
- having been suspended, spent time in Alternative Provision or permanently excluded from school,
- having experienced child maltreatment,
- having been involved in offending, such as theft or robbery,
- having used drugs or alcohol in early adolescence, and
- having previously been a victim or previously perpetrated violence

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

4.18 Making or sharing of nudes or semi-nudes, including where generated by AI

The school will ensure that staff are aware to treat the consensual and non-consensual sharing of nudes or semi-nudes as a safeguarding concern and follow reporting procedures to the DSL.

For the purposes of this policy, the term 'making or sharing nudes or semi-nudes' refers to the creation, sending or posting of nude or semi-nude images by young people under the age of 18. The term 'images' includes all visual content, such as photographs, videos and livestreams.

For the purposes of this policy, nudes or semi-nudes are defined as an image which meets one or more of the following criteria:

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

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

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

Where a member of staff becomes aware of an incidence of sharing self-generated intimate imagery, they will refer this to the DSL as soon as possible. Where a pupil confides in a staff member about the circulation of self-generated intimate imagery, depicting them or someone else, the staff member will:

- Refrain from viewing, copying, printing, sharing, storing or saving the imagery.
- Tell the DSL immediately if they accidentally view an self-generated intimate image and seek support.
- Explain to the pupil that the incident image will need to be reported.
- Respond positively to the pupil without blaming or shaming anyone involved and reassuring them that they can receive support from the DSL.
- Report the incident to the DSL.

The DSL will attempt to understand what the image contains without viewing it and the context surrounding its creation and distribution – they will categorise the incident into one of two categories:

- Aggravated: incidents which involve additional or abusive elements beyond the creation and distribution of self-generated intimate images of pupils, including where there is an adult involved, where there is an intent to harm the pupil depicted, or where the images are used recklessly.
- Experimental: incidents involving the creation and distribution of self -generated intimate images of pupils where there is no adult involvement or apparent intent to cause harm or embarrassment to the pupil.

For there to be a good and clear reason to view imagery, the DSL would need to be satisfied that this action is:

- The only way to decide about whether to involve other agencies because it is not possible to establish the facts, e.g. the contents of the imagery, from the pupil(s) involved.

- Necessary to report it to a website, app or suitable reporting agency to have the image taken down, or to support the pupil or their parent in making a report.
- Unavoidable because the pupil has presented the image directly to a staff member or the image has been found on a school device or your school's network.

Where it is necessary to view the imagery, e.g. if this is the only way to make a decision about whether to inform other agencies, the DSL should:

- Never copy, print, share, store or save them as this is illegal – if this has already happened, contact the local police for advice and to explain the circumstances.
- Discuss the decision with the headteacher or a member of the SLT.
- Make sure viewing is undertaken by the DSL (or equivalent) or another member of the safeguarding team with delegated authority from the headteacher or a member of the SLT.
- Make sure viewing takes place with another member of staff present in the room, ideally the headteacher or a member of the SLT. This staff member does not need to view the images.
- Wherever possible, make sure viewing takes place on the school premises, ideally in the headteacher's office or a member of the SLT's office.
- Make sure, wherever possible, that they are viewed by a staff member of the same sex as the pupil in the images.
- Record how and why the decision was made to view the imagery in the safeguarding or child protection records, including who was present, why the self-generated intimate imagery were viewed and any subsequent actions.

Where the incident is categorised as 'aggravated', the situation will be managed in line with the school's Child-on-Child Abuse Policy. Where the incident is categorised as 'experimental', the pupils involved are supported to understand the implications of sharing self-generated intimate imagery and to move forward from the incident. Where there is reason to believe that self-generated intimate imagery being circulated will cause harm to a pupil, the DSL escalates the incident to CSC. Where self-generated intimate imagery of a pupil has been shared publicly, the DSL will work with the pupil to report imagery to sites on which it has been shared and will reassure them of the support available.

4.19 Adult involvement in youth-produced sexual imagery (YPSI)

Sexually motivated incidents

The school will remain aware that not all instances of YPSI will be between children and young people, and in some cases may involve adults posing as a child for the purpose of obtaining intimate imagery from persons under 18.

Staff will be aware of the signs that an adult is involved in the sharing the intimate imagery. These include:

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

Financially motivated incidents

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

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

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

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

4.20 Children absent from education

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

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

Admission register

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

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

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

- The full name of the parent with whom the pupil will live
- The new address
- The date from when the pupil will live at that address
- If a parent notifies the school that their child will be attending a different school, or is already registered at a different school, the following information will be recorded on the admissions register:
- The name of the new school
- The date on which the pupil first attended, or is due to attend, that school
- Where a pupil moves to a new school, the school will use a secure internet system to securely transfer pupils' data.

To ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any pupil who is going to be deleted from the admission register, in accordance with the Education (Pupil Registration) (England) Regulations 2006 (as amended), where they:
Have been taken out of the school by their parents, and are being educated outside the national education system, e.g. home education.
Have ceased to attend the school, and no longer live within a reasonable distance of the premises.

Have been certified by the school's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention to the pupil continuing to attend school after ceasing to be of compulsory school age.
Have been in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of that period.
Have been permanently excluded.

The school will also remove a pupil from the admissions register where the school and LA has been unable to establish the pupil's whereabouts after making reasonable enquiries into their attendance.
If a pupil is to be removed from the admissions register, the school will provide the LA with the following information:

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

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

4.21 Pupil with family members in prison

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

Parental consent must be sought before support is offered to the child.

4.22 Pupils required to give evidence in court

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

Pupils will be provided with the booklet 'Going to Court' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns (Primary School).

Pupils will be provided with the booklet 'Going to Court and being a witness' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns (Secondary School).

4.23 Use of the School Premises for Non-School Activities

Where the school committee or Trust hires or rents out school facilities or the school premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate arrangements are in place to keep pupils safe. The Trust will refer to the DfE's guidance on keeping children safe in out-of-school settings in these circumstances.

Where the governing board provides the activities under the direct supervision or management of school staff, safeguarding and child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, the governing board will seek assurance that the body

concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The governing board will also ensure that there are arrangements in place to liaise with the school on these matters where appropriate. The governing board will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises and specify that failure to comply with this would lead to termination of the agreement.

Extracurricular activities and clubs

Extra-curricular activities and clubs hosted by external bodies, e.g. charities or companies, will work in collaboration with the school to effectively safeguard pupils and adhere to local safeguarding arrangements.

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

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

5. Recognising signs of child abuse & neglect

5.1. Categories of Abuse:

- Physical Abuse
- Emotional Abuse (including Domestic Abuse)
- Sexual Abuse (including child sexual exploitation)
- Neglect

5.2. Signs of Abuse in Children:

The following non-specific signs may indicate something is wrong:

- Significant change in behaviour
- Extreme anger or sadness
- Aggressive and attention-needing behaviour
- Suspicious bruises with unsatisfactory explanations
- Lack of self-esteem
- Self-injury
- Depression and/or anxiousness
- Age-inappropriate sexual behaviour
- Child Sexual Exploitation
- Criminality
- Drug taking and/or alcohol misuse
- Mental health problems
- Unexplainable and/or persistent absences from education
- Serious violence, criminal exploitation (including that linked to county lines) , radicalisation
- Consensual and non-consensual sharing of self-generated intimate imagery

5.3. Risk Indicators

The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred, but:

- Must be regarded as indicators of the possibility of significant harm.
- Justifies the need for careful assessment and discussion with designated / named / lead person, manager, (or in the absence of all those individuals, an experienced colleague).

- May require consultation with and / or referral to Children's Services.

The absence of such indicators does not mean that abuse or neglect has not occurred. In an abusive relationship the child may:

- Appear frightened of the parent/s
- Act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development and different ethnic groups)

The parent or carer may:

- Persistently avoid child health promotion services and treatment of the child's episodic illnesses
- Have unrealistic expectations of the child
- Frequently complain about/to the child and may fail to provide attention or praise (high criticism/low warmth environment)
- Be absent or misusing substances
- Persistently refuse to allow access on home visits
- Be involved in domestic abuse

Staff should be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household.

5.4. Recognising Physical Abuse

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury
- Unexplained delay in seeking treatment
- The parents/carers are uninterested or undisturbed by an accident or injury
- Parents are absent without good reason when their child is presented for treatment
- Repeated presentation of minor injuries (which may represent a "cry for help" and if ignored could lead to a more serious injury)
- Family use of different doctors and A&E departments
- Reluctance to give information or mention previous injuries

5.5. Bruising

Children can have accidental bruising, but the following must be considered as non-accidental unless there is evidence, or an adequate explanation provided:

- Any bruising to a pre-crawling or pre-walking baby
- Bruising in or around the mouth, particularly in small babies which may indicate force feeding
- Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive)
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally
- Variation in colour possibly indicating injuries caused at different times
- The outline of an object used e.g., belt marks, handprints or a hairbrush
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- Bruising around the face
- Grasp marks on small children
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse

5.6. Bite Marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older child.
A medical opinion should be sought where there is any doubt over the origin of the bite.

5.7. Burns and Scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g.:

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water is his/her own accord will struggle to get out and cause splash marks)
- Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation
- Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

5.8. Fractures

Fractures may cause pain, swelling and discolouration over a bone or joint. Non-mobile children rarely sustain fractures.
There are grounds for concern if:
The history provided is vague, non-existent or inconsistent with the fracture type
There are associated old fractures
Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement
There is an unexplained fracture in the first year of life

5.9. Scars

Many scars or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

5.10. Recognising Emotional Abuse

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse. The indicators of emotional abuse are often also associated with other forms of abuse.

The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent/carer e.g., anxious, indiscriminate or not attachment
- Indiscriminate attachment or failure to attach
- Aggressive behaviour towards others
- Scapegoated within the family
- Frozen watchfulness, particularly in pre-school children
- Low self-esteem and lack of confidence
- Withdrawn or seen as a "loner" – difficulty relating to others

5.11. Recognising Signs of Sexual Abuse

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about, and full account should be taken of the cultural sensitivities of any individual child/family.

Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural.

5.12. Behavioural indicators associated with Sexual Abuse

Some physical indicators associated with this form of abuse are:

- Inappropriate sexualised conduct
- Sexually explicit behaviour, play or conversation, inappropriate to the child's age
- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder), self-mutilation and suicide attempts
- Involvement in prostitution or indiscriminate choice of sexual partners
- An anxious unwillingness to remove clothes e.g., for sports events (but this may be related to cultural norms or physical difficulties)

5.13. Physical Indicators Associated with Sexual Abuse

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area
- Blood on underclothes
- Pregnancy in a younger girl where the identity of the father is not disclosed
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing

5.14. Physical Indicators Associated with Neglect

Evidence of neglect is built up over a period of time and can cover different aspects of parenting. Indicators include:

- Failure by parents or carers to meet the basic essential needs e.g., adequate food, clothes, warmth, hygiene and medical care
- A child seen to be listless, apathetic and irresponsive with no apparent medical cause
- Failure of child to grow within normal expected pattern, with accompanying weight loss
- Child thrives away from home environment
- Child frequently absent from school
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods

6. Abuse and sexual harassment

Sexual harassment refers to 'unwanted conduct of a sexual nature' which can occur both online and offline and inside and outside of school. In this context it specifically relates to child-on-child sexual harassment. Such behaviour can:

- violate a child's dignity,
- make them feel intimidated, degraded or humiliated, and
- create a hostile, offensive or sexualised environment.

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance

and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children. Staff should be vigilant to:

- bullying (including cyberbullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment
- self-generated intimate imagery
- initiation/hazing type violence and rituals
- upskirting

6.1 Inappropriate Sexual Behaviour

Can be inappropriate socially, in appropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is "acting out" which may derive from other sexual situations to which the child or young person has been exposed. If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

6.2 Abusive sexual activity

Abusive sexual activity includes any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base. To more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

- Equality – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies
- Consent – agreement including all the following:
    - Understanding that is proposed based on age, maturity, development level, functioning and experience
    - Knowledge of society's standards for what is being proposed
    - Awareness of potential consequences and alternatives
    - Assumption that agreements or disagreements will be respected equally
    - Voluntary decision
    - Mental competence
- Coercion – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

7. Use of reasonable force

Staff may use reasonable force (physical intervention) where necessary. This forms part of a wider approach to restrictive interventions, which are always used proportionately, (as a last resort, when a child is endangering themselves or others, damaging property or causing disorder) and in line with safeguarding principles. At all times it must be the minimal force necessary to prevent injury to another person and reasonable and proportionate to the risk that is prevented. Such events should be recorded, and witness statements should be gathered, if available.

Staff who are likely to need to use physical intervention will be appropriately trained, but this does not prevent other staff from making an intervention if it is deemed necessary.

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

Particular care must be taken when responding to incidents involving pupils with SEND, medical needs, or mental health difficulties, recognising their increased vulnerability and ensuring compliance with the Equality Act 2010. The school will promote proactive behaviour support and, where appropriate, individual plans to reduce the need for physical intervention.

Appendix Part 3: Procedures and Processes for the Safeguarding team

8. Resources for teaching about safeguarding

Annex A in KCSIE provides a substantial number of resources to support DSLs in their role.

Other resources may also help schools and colleges understand and teach about safeguarding:

- Teaching about relationships, sex and health
- DfE advice for schools: teaching online safety in schools
- The Oak National Academy have produced classroom resources to support teaching of the updated curriculum: Free, time-saving teacher resources | Oak National Academy
- UK Council for Internet Safety (UKCIS) guidance: Education for a connected world
- UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people
- The UKCIS external visitors guidance will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors
- National Crime Agency's CEOP Education Programme: Protecting children and young people from online child sexual abuse through education.
- PSHE Association accredited lesson plans and resources aligned to the RSHE curriculum
- Public Health England: Every Mind Matters
- Harmful online challenges and online hoaxes

Mental Health and Wellbeing

Schools can also access advice to help them identify children in need of extra mental health support. Additional guidance and resources can be found on the Promoting and supporting mental health and wellbeing in schools and colleges website on GOV.UK.

The NHS Every Mind Matters website also contains helpful information and advice about looking after a child's mental health.
The Hub of Hope is the UK's leading mental health support database. It brings local, national, peer, community, charity, private and NHS mental health support and services together in one place, so that anyone struggling can find the most appropriate support.

9. Handling allegations of abuse against pupils

Staff will always, when handling an incident of alleged abuse, take the report of the victim seriously, reassure them, support them and work to keep them safe. Victims will never be made to feel like they are causing a problem by reporting any form of abuse, be made to feel ashamed, or have their experience minimised by staff at the school. Staff will be aware of the importance of not downplaying any reports of abuse; however, will ensure that they remain sympathetic, and observant of the duty of care, to both the alleged perpetrator(s) and victim(s).

If a friend of a victim makes a report or a member of staff overhears a conversation, staff will take action – they will never assume that someone else will deal with it or wait for a disclosure. The basic principles remain the same as when a victim reports an incident; however, staff will consider why the victim has not chosen to make a report themselves, and the discussion will be handled sensitively

and with the help of children's social care where necessary. If staff are in any doubt, they will speak to the DSL. All staff will be aware that pupils may not feel ready or know how to tell someone that they are being abused, and/or they may not recognise their experiences as harmful. This will not prevent staff from having a professional curiosity and speaking to the DSL if they have any concerns.

Where an alleged incident took place away from the school or online but involved pupils from the school, the school's duty to safeguard pupils remains the same and the incident will be treated equally as seriously and investigated in the same way as an incident that took place in school.

All staff will be trained to handle disclosures. Effective safeguarding practice includes:

- Do not promise confidentiality at the outset.
- Share information with those necessary for its progression.
- Explain next steps and who the report will be shared with.
- Recognise the trust placed in the staff member receiving the disclosure.
- Be clear about boundaries and how the report will be handled.
- Use open questions only; avoid leading questions.
- Record a full summary immediately after; if taking notes during, remain attentive.
- Understand disclosures may be gradual and incomplete at first.
- Keep communication open and supportive.
- Record facts only, not personal opinions.
- Follow guidance where an online element is involved (searching, screening, confiscation).
- Where possible, have two staff present (ideally including the DSL/deputy).
- Inform the DSL/deputy as soon as possible if not present.

Confidentiality

The school will only engage staff and agencies required to support the victim and/or be involved in any investigation. If a victim asks the school not to tell anyone about the disclosure, the school will not make this promise. The school will adhere to the principle that, even without the victim's consent, the information may still be lawfully shared if it is in the public interest and protects children from harm.

The DSL will consider the following when making confidentiality decisions:

- Parents will be informed unless it will place the victim at greater risk
- If a pupil is at risk of harm, is in immediate danger or has been harmed, a referral will be made to children's social care
- Rape, assault by penetration and sexual assault are crimes – reports containing any such crimes will be passed to the police

The DSL will weigh the victim's wishes against their duty to protect the victim and others. If a referral is made against the victim's wishes, it will be done so extremely carefully and the reasons for referral will be explained to the victim. Appropriate specialist support will always be offered.

Anonymity

There are legal requirements for anonymity where a case is progressing through the criminal justice system. The school will do all it can to protect the anonymity of children involved in any report of sexual violence or sexual harassment. It will carefully consider, based on the nature of the report, which staff will be informed and what support will be in place for the children involved. When deciding on the steps to take, the school will consider the role of social media in potentially exposing victims' identities and facilitating the spread of rumours.

Risk assessment

The DSL or a deputy will make an immediate risk and needs assessment any time there is a report of sexual violence. For reports of sexual harassment, a risk assessment will be considered on a case-by-

case basis. Risk assessments are not intended to replace the detailed assessments of experts, and for incidents of sexual violence it is likely that a professional risk assessment by a social worker or sexual violence specialist will be required.

Risk assessments will consider:

- The victim.
- The alleged perpetrator.
- Other pupils at the school, especially any actions that are appropriate to protect them.

Risk assessments will be recorded, either on paper or electronically, and kept under review in accordance with the school's Data Protection Policy.

Taking action following a disclosure

The DSL or a deputy will decide the school's initial response, taking into consideration:

- The victim's wishes.
- The nature of the incident.
- The ages and developmental stages of the pupils involved.
- Any power imbalance between the pupils.
- Whether the incident is a one-off or part of a pattern.
- Any ongoing risks.
- Any related issues and the wider context, such as whether there are wider environmental factors in a pupil's life that threaten their safety and/or welfare.
- The best interests of the pupil.
- That sexual violence and sexual harassment are always unacceptable and will not be tolerated.

Immediate consideration will be given as to how to support the victim, alleged perpetrator and any other pupils involved.

For reports of rape and assault by penetration, the alleged perpetrator will be removed from any classes shared with the victim whilst the school establishes the facts. The school will consider how to keep the victim and alleged perpetrator apart on school premises, and on transport where applicable. These actions will not be seen as a judgement of guilt on the alleged perpetrator

For reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator and the suitability of shared classes, premises and transport will be considered immediately. In all cases, the initial report will be carefully evaluated and the wishes of the victim, nature of the allegations and requirement to protect all children will be taken into consideration.

Where a pupil is found to have been involved in harmful sexual behaviour, e.g., non-consensually sharing self-generated intimate imagery of another pupil, the school will help the pupil to move forward from the incident by supporting them in adopting more positive behaviour patterns and attitudes.

Managing the report

The decision of when to inform the alleged perpetrator of a report will be made on a case-by-case basis. If a report is being referred to children's social care or the police, the school will speak to the relevant agency to discuss informing the alleged perpetrator.

There are four likely outcomes when managing reports of sexual violence or sexual harassment:

1. Managing internally
2. Providing family and early help
3. Referring to children's social care

4. Reporting to the police

Whatever outcome is chosen, it will be underpinned by the principle that sexual violence and sexual harassment are never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons behind decisions will be recorded either on paper or electronically.

The following situations are statutorily clear and do not allow for contrary decisions:

- The age of consent is 16.
- A child under the age of 13 can never consent to sexual activity.
- Sexual intercourse without consent is always rape.
- Rape, assault by penetration and sexual assault are defined in law.
- Creating and sharing sexual photos and videos of children under 18 is illegal – including children making and sending images and videos of themselves.

In some cases, e.g., one-off incidents, the school may decide to handle the incident internally through behaviour and bullying policies and by providing pastoral support.

Providing family and early help

The school may decide that statutory interventions are not required, but that pupils may benefit from family and early help – providing support as soon as a problem emerges. This approach can be particularly useful in addressing non-violent harmful sexual behaviour and may prevent the escalation of sexual violence.

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

Referral to children's social care

If a pupil has been harmed, is at risk of harm or is in immediate danger, the school will make a referral to children's social care. Parents will be informed unless there is a compelling reason not to do so, e.g., if the referral will place the victim at risk. This decision will be made in consultation with children's social care.

The school will not wait for the outcome of an investigation before protecting the victim and other children.

The DSL will work closely with children's social care to ensure that the school's actions do not jeopardise any investigation. Any related risk assessment will be used to inform all decisions. If children's social care decides that a statutory investigation is not appropriate, the school will consider referring the incident again if they believe the pupil to be in immediate danger or at risk of harm. If the school agrees with the decision made by children's social care, they will consider the use of other support mechanisms such as family and early help, pastoral support and specialist support.

Reporting to the police

Reports of rape, assault by penetration or sexual assault will be passed on to the police – even if the alleged perpetrator is under 10 years of age. Generally, this will be in parallel with referral to children's social care. The DSL and deputies will follow the local process for referral.

Parents will be informed unless there is a compelling reason not to do so. Where parents are not informed, it is essential for the school to support the pupil with any decision they take, in unison with children's social care and any appropriate specialist agencies.

The DSL and governing board will agree what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. They will also discuss the best way to protect

the victim and their anonymity. The DSL will be aware of local arrangements and specialist units that investigate child abuse.
In some cases, it may become clear that the police will not take further action, for whatever reason. In these circumstances, the school will continue to engage with specialist support for the victim as required.

Bail conditions

Pupils against whom further action is taken by the police may be released under bail conditions or 'released under investigation' (RUI) in circumstances that do not warrant the application of bail.

Where this occurs and the perpetrator returns to school, the school's primary focus will be conducting an assessment of the risk the perpetrator poses to the victim or other pupils and staff at the school, both physically and in terms of trauma or emotional stress and implementing any mitigating measures necessary to reduce the harm caused.

The school will work with children's social care and the police to support the victim, alleged perpetrator and other pupils, especially witnesses, during criminal investigations. The school will seek advice from the police to ensure they meet their safeguarding responsibilities.
The school will liaise with police investigators to develop a balanced set of arrangements whereby both the alleged perpetrator and the victim can continue to receive a suitable education without compromising any ongoing investigations or the emotional state of the victim.

Managing delays in the criminal justice system

The school will not wait for the outcome, or even the start, of criminal proceedings before protecting the victim, alleged perpetrator and other children. The associated risk assessment will be used to inform any decisions made. The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

The end of the criminal process

Risk assessments will be updated if the alleged perpetrator receives a caution or is convicted. If the perpetrator remains in the same school as the victim, the school will set out clear expectations regarding the perpetrator, including their behaviour and any restrictions deemed reasonable and proportionate with regards to the perpetrator's timetable. The school will ensure that the victim and perpetrator remain protected from bullying and harassment (including online).

Where an alleged perpetrator is found not guilty or a case is classed as requiring 'no further action', the school will offer support to the victim and alleged perpetrator for as long as is necessary. Staff will be aware that the victim is likely to be traumatised and the fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. The school will discuss decisions with the victim and offer support. The alleged perpetrator will also be offered ongoing support if needed, as they have also been through a difficult and upsetting experience.

The headteacher will carefully consider, on a case-by-case basis, whether allowing the victim and the alleged perpetrator to share classes or attend the same activities is conducive to either party's effective education, and will implement alternative arrangements, in consultation with the DSL (and SENCO where the victim or alleged perpetrator has SEND), where necessary.

Ongoing support for the victim

Any decisions regarding safeguarding and supporting the victim will be made with the following considerations in mind:

- The terminology the school uses to describe the victim
- The age and developmental stage of the victim

- The needs and wishes of the victim
- Whether the victim wishes to continue in their normal routine
- The victim will not be made to feel ashamed about making a report
- What a proportionate response looks like

Victims may not disclose the whole picture immediately and they may be more comfortable talking about the incident on a step-by-step basis; therefore, a dialogue will be kept open and the victim can choose to appoint a designated trusted adult.

Staff will be aware that victims may struggle in a normal classroom environment. Whilst the school will understand that it is important not to isolate the victim, the victim may wish to be withdrawn from lessons and activities at times. The school will ensure that this will only happen when the victim wants it to, not because it makes it easier to manage the situation. The school will provide a physical space for victims to withdraw to.

The school will be aware that victims may require support for a long period of time and will be prepared to offer long-term support in liaison with relevant agencies. The school will ensure that everything possible will be done to prevent the victim from bullying and harassment as a result of any report they have made. If the victim is unable to remain in the school, alternative provision or a move to another school will be considered – this will only be considered at the request of the victim and following discussion with their parents. If the victim does move to another school, the DSL will inform the school of any ongoing support needs and transfer the safeguarding and child protection file.

Ongoing support for the alleged perpetrator

Any decisions made regarding the support required for an alleged perpetrator will be made with the following considerations in mind:

- The terminology the school uses to describe the alleged perpetrator
- The balance of safeguarding the victim and providing the alleged perpetrator with education and support
- The reasons why the alleged perpetrator may have abused the victim – and the support necessary
- Their age and developmental stage
- What a proportionate response looks like
- Whether the behaviour is a symptom of their own abuse or exposure to abusive practices and/or materials
- What the outcome of the investigation was

When deciding, advice will be taken from children's social care, specialist sexual violence services and the police as appropriate. If the alleged perpetrator moves to another school, for any reason, the DSL will inform the destination school of any ongoing support needs and transfer the safeguarding and child protection file.

If the reported abuse is found to have taken place, the school will work with professionals, as required, to understand why the abuse took place and provide a high level of support to help the pupil understand and overcome the reasons for their behaviour and reduce the likelihood of them abusing again.

Disciplining the alleged perpetrator

Disciplinary action can be taken whilst investigations are ongoing and the fact that investigations are ongoing will not prevent the school reaching its own conclusion and imposing an appropriate penalty.

The school will make such decisions on a case-by-case basis, with the DSL taking a leading role. The school will take into consideration whether any action would prejudice an investigation and/or subsequent prosecution. The police and children's social care will be consulted where necessary. The school will also consider whether circumstances make it unreasonable or irrational for the school to decide about what happened while an investigation is considering the same facts.

Disciplinary action and support can take place at the same time. The school will be clear whether action taken is disciplinary, supportive or both.
Shared classes

Once the DSL has decided to progress a report, they will again consider whether the victim and alleged perpetrator will be separated in classes, on school premises and on school transport, the school's duty to educate against its duty to safeguard. The best interests of pupils will always come first. Where there is a criminal investigation into rape or assault by penetration, the alleged perpetrator will be removed from classes with the victim and potential contact on school premises and transport will be prevented.

Where a criminal investigation into rape or assault by penetration leads to a conviction or caution, in all but the most exceptional circumstances, this will constitute a serious breach of discipline and result in the view that allowing the perpetrator to remain in the school would harm the education or welfare of the victim and potentially other pupils.

Where a criminal investigation into sexual assault leads to a conviction or caution, the school will consider suitable sanctions and permanent exclusion. If the perpetrator remains at the school, the school will keep the victim and perpetrator in separate classes and manage potential contact on school premises and transport. The nature of the conviction or caution, alongside the wishes of the victim, will inform any discussions made.

Where a report of sexual assault does not lead to a police investigation, this does not mean that the offence did not happen or that the victim has lied. Both the victim and alleged perpetrator will be affected, and appropriate support will be provided. Considerations regarding sharing classes and potential contact will be made on a case-by-case basis.
In all cases, the school will record its decisions and be able to justify them. The needs and wishes of the victim will always be at the heart of the process.

Working with parents

In most sexual violence cases, the school will work with the parents of both the victim and alleged perpetrator. For cases of sexual harassment, these decisions will be made on a case-by-case basis.
The school will meet the victim's parents with the victim present to discuss the arrangements being put in place to safeguard the victim, and to understand their wishes in terms of support arrangements and the progression of the report.

Schools will also meet with the parents of the alleged perpetrator to discuss arrangements that will impact their child, such as moving them out of classes with the victim. Reasons behind decisions will be explained and the support being made available will be discussed. The DSL or a deputy will attend such meetings, with agencies invited as necessary.

Clear policies regarding how the school will handle reports of sexual violence and how victims and alleged perpetrators will be supported will be made available to parents.

Safeguarding other pupils

Pupils who have witnessed sexual violence, especially rape and assault by penetration, will be provided with support. It is likely that pupils will "take sides" following a report, and the school will

do everything in its power to protect the victim, alleged perpetrator and witnesses from bullying and harassment.

The school will keep in mind that contact may be made between the victim and alleged perpetrator, and that harassment from friends of both parties could take place via social media, and will do everything in its power to prevent such activity.

As part of the school's risk assessment following a report, transport arrangements will be considered, as it is a potentially vulnerable place for both the victim and alleged perpetrator. Schools will consider any additional support that can be put in place.

10. Managing safeguarding provision

10.1 Alternative Provision (AP)

The school remains responsible for a pupil's welfare and safeguarding during their time at an AP. When placing a pupil with an AP, the school should be satisfied that the placement meets the pupil's needs.

Schools should obtain written information from the AP that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that schools would otherwise perform on their own staff).

Reviews should be frequent enough (at least half termly) to provide assurance that the child is regularly attending, and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the placement should be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

10.2 Work Experience

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

10.3 Sport

As children get older, some sports are typically taught and played in single sex groups. The Equality Act 2010 contains an exception in relation to single-sex sport. It applies to participation in any sport or game, or activity of a competitive nature, 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). This means that the school can separate children according to their biological sex in these circumstances without discriminating unlawfully against them because of their sex.

Some sports may need to be played in single-sex groups from a certain age to ensure children's safety, and where this is the case there should be no exceptions. In other cases, the school may have adopted a policy of single-sex sports for reasons related to fairness.

Where there are no safety concerns and a child makes a request relating to how they participate, the school will need to consider the request in light of the advice on "considering requests for support with social transition". Schools need to take into account all the relevant factors, including whether supporting social transition is overall in the best interests of the child, as well as considering the impact on other children and the aim of creating safe and fair environments for children to participate in PE.

11. Managing safeguarding requirements on school premises

11.1Toilets

Schools must not allow children into toilets designated for the opposite biological sex. This includes where schools are responding to a request to support any degree of social transition for children who are questioning their gender.

Apart from where individual toilets are in a room that can be locked from the inside, intended for use by one pupil at a time, the school must provide separate toilets for boys and girls aged 8 and over. Therefore, if a child does not want to use the toilet designated for their biological sex, the school should consider whether they can provide an alternative toilet facility, for example self-contained individual toilets, without compromising the provision of single-sex facilities. These alternative arrangements should not compromise the safety, comfort, privacy or dignity of the child, or of other children.

The school should keep a clear record of these situations, ensure they are communicated appropriately, and review them regularly. Where the school provides mixed-sex toilets in addition to single sex toilets, the school should assess safeguarding risks and plan accordingly, for example, mixed-sex toilets should open directly onto public areas (e.g. a corridor).

11.2Changing rooms and showers

Schools must not allow a child, aged 11 years or older at the start of the school year, to undress in front of a child of the opposite biological sex, to comply with their safeguarding duties.

When responding to a request to support any degree of social transition this must not include allowing access to changing rooms designated for the opposite sex.

The School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014 require maintained schools and academies and independent schools to provide suitable changing accommodation and showers for pupils who are aged 11 years or over at the start of the school year. This means that it must be suitable for the pupils it is provided for, having regard to their ages, numbers and sex and any special requirements they may have.

If a child does not want to use the changing rooms and showers designated for their sex, the school should consider whether they can provide an alternative changing or washing facility, but this must not compromise the provision of single-sex facilities. This could be a fully enclosed room – for use by one child at a time that can be secured from the inside – or by allowing access to facilities at an alternative time. It is important that the school keeps a clear record of these situations, ensure they are communicated appropriately, and review them regularly.

12. CCE risk assessment and management tool

Name:		Date of referral:	Total risk score:
EXPLOITATION RISK CATEGORIES			
Running Away / Going Missing	EMERGING	Regularly coming home late / Absent without permission / Returning late to care home / Absent from school / Whereabouts often unknown	
	MODERATE	Frequently staying out overnight without permission / Episodes of running away, missing from home or placement / Looking well cared for despite having no known base / Regular breakdowns of placement due to behavioural problems / Taken to parties, houses, unknown areas, hotels, nightclubs, takeaways or out of area by unknown adults / Returns from missing episodes with injuries or dishevelled appearance / Extended periods of being missing from home or placement	
	SIGNIFICANT	Persistently running away, going missing from home or placement / Pattern of street homelessness / Whereabouts often unknown or of significant concern, talks about and/or known to travel to different areas or cities, persistently found outside of area where they reside / Returns from missing episodes with injuries (suggestive of physical assault) or dishevelled appearance	
Coercion / Control	E	Change in behaviour / Recent change in peer group / Not mixing with usual friends / Reduced contact with family	
	M	In possession of multiple handsets / Limited contact with family/friends / Possession of hotel keys/cards or key to unknown locations	
	S	In possession of multiple handsets / Receives an excessive number of text messages or phone calls / Possesses multiple sim cards / sim card packaging / Possess 'burner' type handsets / Disclosure of or police intelligence regard physical assault followed by withdrawn allegation/reluctant to report / No contact with family/friends / Disappears from system (no contact with support systems) / Disclosure of or police intelligence relating to county lines/gang activity involvement or links / Talks about having drug debts and an urgent need for money / Family report hostile acquaintances coming to the door or telephoning/messaging and making threats.	
Contact with Abusive Persons and / or Risky Environments	E	Some association with unknown adults and/or other criminally exploited children and/or missing children / Some association with manipulative peers / Some association with gang and county lines involved adults or peers / Increased interest in making money	
	M	Associating with unknown adults and/or other criminally exploited children/young people and/or missing children / Information and police intelligence suggesting involvement in CCE / Associating with possible county lines or gang members / Getting into cars with unknown adults or suspected perpetrators of CCE / New or expensive possessions which cannot be accounted for / Unexplained wealth / Access to cash/money / Spending time in areas where drug activity known to take place or fearful of going to certain areas / Fearful of reprisals from gang members or violence from young people/adults or unidentified persons / Sign of travel (train tickets / cab receipts) / Undertakes 'work' in return for material items or money	
	S	Identifying as a county lines or gang member / Found in areas/properties known for CCE or drug activity / Evidence or Police Intelligence to suggest being transported out of area of residence for purpose of drug dealing / Abducted and forced imprisonment (described by young person as "locked in")	
Substance Misuse / Drug possession	E	Experimenting with alcohol/cannabis / Associating with young people known to use substances regularly	
	M	Regular use of or recent increase in use of illegal substances / Associating with known drug dealers / Seen in known areas for selling drugs / Seen associating with young people who are running and involved in drug lines	
	S	Evidence of increased use of alcohol/drugs / Found in possession of large quantities of drugs (especially heroin/crack cocaine) / Secretes drugs inside rectum or vagina / Dealing of substances / Stores drugs for others / Found in areas/properties known for drug activity / Supply of substances to others / forced to sell drugs to pay off debts e.g drug debt (debt bondage) / Known to be actively involved in networks that run drug lines	
Education	E	Mainly engaged in education, employment or training but exhibits some attendance/behaviour issues / Poor educational achievement / Repeated reports of internal truancy	
	M	Irregular/poor attendance / Truanting from school / Losing interest in education / Periods of exclusion(s) / Whereabouts during school hours unknown/ Poor educational achievement	

Name:		Date of referral:	Total risk score:
EXPLOITATION RISK CATEGORIES			
	S	Not in Education, training or employment / Regular breakdown of school placements due to behavioural problems/ Whereabouts during school hours unknown and information suggesting links to CCE/County Lines or Gangs / Poor educational achievement	
Emotional & Physical Health	E	Low self-esteem / Some or reduced concerns of self-harm and/or eating disorders / Difficulty in making or maintaining friendships with peers / Increasing use of sexualised language and language in relation to drug dealing and/or violence / Diagnosed or suspected mental health need	
	M	Low self-esteem impacting upon young person's mental health / Increased concerns of self-harm / Violent/emotional outbursts or bullying or threatening behaviour / Offending behaviour / Difficulty in making or maintaining friendships with peers / Concerns young person may be exposed to violence / Increasingly disruptive, hostile or physically aggressive at home/placement or school / Unexplained physical injuries suggestive of physical assault / Attendance at A&E with injuries not consistent with explanation of the subject (only if ABH level of above)	
	S	Chronic low self-esteem / Changes or extremes in mental health / Expressions around invincibility or not caring about what happens to them / Evidence of self-harm / Attendance at A&E with significant injuries (especially if caused by a knife/weapon)	
Accommodation and family relationships	E	Accommodation generally doesn't meet needs of young person / Support unavailable from family/parent/carer / Communication within home environment is lacking / Known peers/older sibling(s) involved in drug distribution/county lines/gangs	
	M	Overcrowding / Living with other young people who are considered to be at risk of CCE / Evidence of decline in relationship and/or communication with family/parent/carer / Known peers/older sibling(s) who are suspected to have county lines debts / Lack of parental supervision or interest in the young person	
	S	Homeless or sofa surfing / Young person often stays elsewhere / Lack of relationship/understanding or trust / Family/friends/peers are known, or suspected victims/perpetrators of CCE / Parent is unavailable to them physically or emotionally	
Offending / Weapons / Criminal Activity	E	Coming to the attention of the police / Concerns about being involved with offending peers or associates / Being in possession of cannabis / Talked about or considered carrying a weapon	
	M	Known to be involved in drug related offending / Police intelligence indicating and/or arrested by the police/charged/ investigated for offences of possession of offensive weapon/ possession of drugs/ drug dealing / theft / Known to be connected with drug distribution networks and lines / Receives rewards of money or goods for introducing peers / Arrested out of area when missing / Arrested on public transport (particularly a train)	
	S	Significant intelligence indicating/charged or convicted of robbery/use of offensive weapon/ possession of large quantities of drugs/possession of large quantity of money / Arrested out of area when missing for drug related offences / Known to be active with drug distribution networks and lines/ recruiting other to run drug lines and to organised crime/ Witness withdrawing statements and suspecting intimidation / Arrested in cuckooed address	
Community / Social Isolation Factors	E	Emerging – Is the young person vulnerable to or experiencing low levels of social isolation that may be exacerbated as a result of Deprivation (including a perceived inability or reluctance to access more mainstream support)/ their Ethnicity/ cultural background/cultural dissonance/ being a Child Looked After/ (LBGT)/ their Special Educational Needs (SEND)/ Poor educational achievement or other factors. Some protective community factors present and support evident.	
	M	Is the young person experiencing moderate levels of social isolation that may be exacerbated by Deprivation/ their Ethnicity/ cultural background/ cultural conflict, being a Looked after Child/ their Special Educational Needs (SEND)/ Poor educational achievement or other factors? Some community protective factors are present, but the young person is reluctant to access them / Starting to socialise with or take an interest in pro-offending groups / Aspires to be part of a local gang or anti-social group.	
	S	Significant – Is the young person experiencing high levels of social isolation that may be exacerbated by deprivation (including being part of an inward-looking community)/ their Ethnicity/ cultural background/ cultural conflict/ being a Looked after Child / their Special Educational Needs (SEND) / Poor educational achievement or other factors / Being targeted by groups or individuals due to their vulnerability / Seeking inclusion/recognition from pro-offending peers or communities / Lack of community protective factors or disengagement by young person / Known to be an active participant in a local gang or anti-social group.	

13. Allegations against staff and low-level concerns policy

13.1 Allegations that may meet the harm threshold

This section applies to all cases in which it is alleged that a current member of staff, including supply teachers, trainee teachers, volunteers or contractors, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

When a referral is made, the headteacher will consider whether an onward referral to the LADO is required.

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective safeguarding and child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the headteacher, or the Trust leader where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.
If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.
Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the Trust
- If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and local authority children's social care where they have been involved.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation

- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded**: to reflect cases where there is no evidence or proper basis that supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or local authority children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or local authority children's social care services, where necessary). Where the police and/or local authority children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or local authority children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to local authority children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or local authority children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with local authority children's

social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher, trainee teacher, or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The Head in consultation with HR will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days

- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or local authority children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

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

The case manager will take advice from the LADO, police and local authority children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with local authority children's social care or the police as appropriate.

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations that have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are substantiated, the case manager will review the circumstances of the case with the LADO to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

13.2 Concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, trainee teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion

- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

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

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's code of conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with data protection laws.

- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues that would ordinarily be included in a reference, such as misconduct or poor performance

13.3 Concerns that do not meet the threshold Reporting form

Thank you for reporting your concerns to the safeguarding team; we are grateful to you for taking the safety and welfare of our pupils seriously. Please fill in the below form, including as much detail as you can, and return it directly to the headteacher or DSL. Please refrain from discussing this concern with anyone other than the headteacher or DSL until the matter has been dealt with. We ask that you keep all details, including the name staff member to whom the concern pertains, confidential.

Your details		
Name		
Role		
Date and time of completing this form		
Details of individual whom the concern is about		
Name		
Role		
Relationship to the individual reporting the concern, e.g., manager, colleague		
Details of concern		
Please include as much detail as possible. Think about the following: What behaviour and/or incident are you reporting? What exactly happened? Why does the behaviour and/or incident worry you? Why do you believe the behaviour and/or incident is not consistent with our Staff Code of Conduct?		
Details of any children or young people involved		
Name(s)		
Do you believe there is a risk of harm to the above children or young people, either now or in the future, as a result of the individual's behaviour? Explain your answer.		
Next steps		
What would you like to see happen in response to your concern?		
Are you willing to meet with the headteacher and DSL to discuss your concern? Please circle as appropriate.		
Please state any other information that you believe is relevant to the processing of this concern.		
Signature		
For use by safeguarding team upon receipt of concern		
Date and time concern received		
Signature of DSL or deputy DSL		
Actions to be taken (e.g., no action, investigation, reclassification as allegation meeting the harms threshold.)		

14. Vulnerability to radicalisation indicators

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

Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.

Indicators of vulnerability include:

- Identity crisis – the student / pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society.
- Personal crisis – the student / pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.
- Personal circumstances – migration; local community tensions; and events affecting the student / pupil's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- Unmet Aspirations – the student / pupil may have perceptions of injustice; a feeling of failure; rejection of civic life.
- Experiences of criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration.
- Special educational need – pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

When assessing whether a pupil is at risk of radicalisation, staff will ask themselves the following questions:

- Does the pupil have access to extremist influences through the internet?
- Does the pupil possess or actively seek extremist material?
- Does the pupil sympathise with, or support, extremist groups or behaviour in their speech or written work?
- Does the pupil's demeanour suggest a new social, religious or political influence, e.g. through jewellery or clothing?
- Has the pupil previously been a victim of discrimination or a religious crime?
- Has the pupil experienced any major disagreements with their peers, family or faith groups, leading to rejection, isolation or exclusion?
- Does the pupil display an irregular and distorted view of religion or politics?
- Does the pupil display a strong objection towards specific cultures, faiths or race?
- Is the pupil a foreign national awaiting a decision regarding deportation or immigration?
- Is there an irregular pattern of travel within the pupil's family?
- Has the pupil witnessed or suffered from trauma or violence in a war zone or through sectarian conflict?
- Is there evidence of a relative or family friend displaying extremist views?
- Has the pupil travelled for extended periods of time to international locations?
- Does the pupil have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the pupil display a lack of affinity or understanding for others?

- Is the pupil a victim of social isolation?
- Does the pupil have insecure, conflicted or absent family relationships?

More critical risk factors could include where a pupil is:

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

Protecting pupils from the risk of radicalisation is part of the school's wider safeguarding duties. The school will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism. Staff will be trained to be vigilant toward the push and pull factors that could make a pupil vulnerable to being drawn into extremism or radicalisation. Staff will use their professional judgement to identify pupils who may be susceptible to extremist ideologies and radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. The school will work with local safeguarding arrangements as appropriate.

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

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect pupils against the risk of radicalisation and maintain an awareness of local risk. The DSL will ensure there is regular prevent training with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

15. Prevent risk assessment template

Person completing:	Date Implemented:	Date for review:

A risk assessment is a core part of implementing the Prevent duty. All providers should read guidance from the department on how to complete a risk assessment and on safeguarding pupils vulnerable to radicalisation. Schools should assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology.

Schools may choose to have a specific separate risk assessment to better communicate to staff and document actions taken to mitigate any risks.
The purpose of the risk assessment is to have an awareness and understanding of the risk of radicalisation in your area and your institution. The type and scale of activity that will address the risk will vary but should be proportionate to the level of risk, type of provision, size and phase of education.

This is an internal document and should be reviewed annually, in line with Keeping Children Safe in Education requirements, or following a serious incident.

National Risks – risk of radicalisation generally

What national risks are you aware of that could impact your area, setting, pupils or families? For example, online radicalisation.

Risk 1 **Radicalisation via the online space** The online space is a key driver across all ideologies and the accessible nature of the internet makes it a viable platform for radicalisation alongside other forms of exploitation. Extremist narratives are becoming more prevalent within mainstream chat forums and social media sites, and extremist thoughts and content are being more commonly shared via online gaming. Extremist groups are now also targeting content towards a younger audience.	**Risk 2** **Radicalisation via extremist gateway groups** Although extremist gateway groups are not deemed to be directly involved in pursuing violent attacks, these groups can act as a pathway for individuals to subscribe to extremist narratives and can facilitate pathways towards violent extremism. Extremist gateway groups can also spread false information and narratives that provoke community tensions.	**Risk 3** **Risk of a terror attack nationally** The current threat level across the UK is deemed to be 'Substantial', which means that an attack is 'likely'. If an attack were to take place, then the method used is most likely to be low-mid complexity. If an attack were to take place, then this could also impact on community tensions and lead to higher levels of hate-crime and anti-Muslim incidents.

Local Risks – risk of radicalisation in Borough of XXX

What specific local risks are you aware of that could impact to your area, setting, pupils or families? E.g. local extremist activity (groups active in the area)

Risk 1 **eg. Radicalisation via the online space**	**Risk 2** **eg. Radicalisation via extremist views (i)**	**Risk 3** **eg. Radicalisation via extremist views (ii)**	**Risk 4** **eg. Emerging Misogynistic Narratives from Online Influencers**

Category	Risk	Hazard	Risk management	Rag	Further action needed	Staff lead	Date for completion

	What is the risk here?	*What are the hazards?*	*What has your institution put in place to ensure sufficient understanding and buy-in from Leadership?*	**H, M, L**			
Leadership	The setting does not place sufficient priority to Prevent and risk assessment/action plans (or does not have one) and therefore actions to mitigate risks and meet the requirements of the Duty are not effective.	Leaders (including governors and trustees) within the organisation do not understand the requirements of the Prevent Statutory Duty or the risks faced by the organisation. The Duty is not managed or enabled at a sufficiently senior level.	Lead governor for safeguarding/Prevent lead is at appropriate seniority. The DSL ensure school adherence to Prevent Statutory Duty details: • Counter-Terrorism and Security Act 2015 • DfE (2023) 'The Prevent duty: safeguarding learners vulnerable to radicalisation' • Home Office (2023) 'Prevent duty guidance: for England and Wales' • DfE (2023) 'Keeping children safe in education 2026' • Equality Act 2010				
		Leaders do not have understanding and ultimate ownership of their internal safeguarding processes, nor ensuring that all staff have sufficient understanding and that staff implement the duty effectively.	Sufficient leadership ownership – risk assessments, safeguarding policies, etc. being signed off by SLT. Leaders use self-evaluation to identify key priorities for continuous improvement				
		Leaders do not communicate and promote the importance of the duty.	Prevent training/briefing for staff (including SLT) and governors. Prevent is part of the Trust Safeguarding policy Part of induction for new staff				
		Leaders do not drive an effective safeguarding culture across the institution.	Leadership have clear understanding of reporting and referral mechanisms Leaders ensure the sharing of safeguarding policies – all staff sign to confirm the reading of the Safeguarding policy and KCSIE annually Promotion of a safeguarding culture through regular training, discussions, etc with senior staff visibly involved. Clear induction for new members of staff and trainee teachers				
		Leaders do not provide a safe environment in which children can learn.	Staff sign to confirm reading of policies Clear reporting procedures Signage around school indicates key Safeguarding staff Pupils taught how to keep themselves safe Clear behaviour policy				

Working in Partnership	The setting is not fully appraised of national and local risks, does not work with partners to safeguard children vulnerable to radicalisation, and does not have access to good practice advice, guidance or supportive peer networks.	The organisation does not establish effective partnerships with organisations such as the Local Authority and Police Prevent Team.	The providers has strong partnerships with: • Local safeguarding partnership procedures • DSL / Headteacher forums • LADO • Community Safety Partnerships • Police Prevent Team • Channel panel • Pupils and families				
		The organisation does not receive updates from local and national organisations	Effective partnerships might include: • Regular attendance at meetings, boards or forums • In receipt of newsletters e.g. Educate Against Hate • Being able to demonstrate effective partnerships by use of the referral process or involvement in Channel				
Staff training	Staff do not recognise signs of abuse or vulnerabilities and the risk of harm is not reported properly and promptly by staff.	Frontline staff including governors, do not understand what radicalisation means and why people may be vulnerable to being drawn into terrorism	All staff and governors undertake annual safeguarding and child protection training which covers the following: • How to identify pupils who may be vulnerable to radicalisation • How to challenge extremist ideas • When it is appropriate to make a referral to the Channel programme Staff form positive relationships with pupils which fosters a positive sense of identity and belonging All concerns are reported via the correct reporting procedures				
		Frontline staff including governors, do not know what measures are available to prevent people from being drawn into terrorism and do not know how to obtain support for people who may be exploited by radicalising influences. Staff do not access Prevent training or refresher training.	The school considers whether identified pupils are low risk, at risk, medium risk or high risk of being drawn into radicalisation. Where a pupil is found to be susceptible to radicalisation, the school will speak to them as soon as possible and will make a Prevent referral if serious concerns are raised. Staff members are aware of the push and pull factors of radicalisation and extremist groups, e.g. feeling isolated and being offered a sense of community, and will remain vigilant to pupils who may be attracted to extremist ideologies and groups by these factors.				
		Staff do not access Prevent training or refresher training.	The DSL ensures all staff attend Prevent training with a focus on Notice, Check, Share The DSL accesses additional support from local partnerships and training on local processes for Prevent when necessary Records of all staff and governor training are maintained				

Information Sharing	Staff do not share information with relevant partners in a timely manner.	Staff do not feel confident sharing information with partners regarding radicalisation concerns.	The school has a culture of safeguarding that supports effective arrangements to: • identify children who may need family and early help or who are at risk of neglect, abuse, grooming or exploitation • help children reduce their risk of harm by securing the support they need, or referring in a timely way to those who have the expertise to help				
		Staff are not aware of the Prevent referral process.	The school has clear processes for raising radicalisation concerns and making a Prevent referral The DSL maintains a record of all incidents indicating a pupil's susceptibility to radicalisation and reviews this termly				
Building children's resilience to radicalisation	Children and young people are exposed to intolerant or hateful narratives and lack understanding of the risks posed by terrorist organisations and extremist ideologies that underpin them.	The setting does not provide a safe space in which children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas.	The school has a code of conduct for all staff (teaching and non-teaching) Safer recruitment checks are taken on all staff British Values is embedded into the curriculum and in particular through PSHE The school curriculum is mapped carefully to ensure tolerance and respect is embedded The school follows awareness days to promote tolerance and understanding of difference Teaching is monitored by leaders regularly The school provides opportunities within the curriculum to discuss controversial issues and for pupils to develop critical thinking and digital literacy skills Discussion of controversial issues are carried out in a safe space				
		The setting does not teach a broad and balanced curriculum which promotes spiritual, moral, cultural mental and physical development of pupils and fundamental British values and community cohesion.	Teaching staff provide a safe environment for debating controversial issues and encourage open debate about different points of views and beliefs. PSHE lessons are used to: • Explore sensitive or controversial issues Equip pupils to recognise and manage risks and make safer choices. • Support pupils to recognise when pressure from others threatens their personal safety and wellbeing. • Enable pupils to develop effective ways of resisting pressures, including how to get help. The school promotes fundamental British values and community cohesion across the curriculum as part of pupils' spiritual, moral, social and cultural development.				

			The school creates an environment in which radicalising ideologies are challenged. Pupils are encouraged to recognise how radicalisers use extremist ideas and narratives to encourage people into participating in or supporting terrorism. The school has procedures in place to disrupt those who voice extremist ideologies and seek to radicalise others into carrying out or supporting terrorism-related activity. Pupils are encouraged to respect other people, with particular regard given to the protected characteristics set out in the Equality Act 2010. The school takes a proportionate approach to building pupils' resilience to radicalisation by accounting for age and the type of education being provided.				
IT policies	Ineffective IT policies increases the likelihood of pupils and staff being drawn into extremist material and narratives online. Inappropriate internet use by pupils is not identified or followed up.	Pupils can access terrorist and extremist material when accessing the internet at the institution. Pupils may distribute extremist material using the institution IT system.	The school has appropriate filtering and monitoring systems in place to limit pupils' exposure to online risks, including extremist content (in line with KCSIE) The DSL and TQS IT team work together to ensure that there is a clear reporting process in place where filtering systems raise safeguarding or Prevent-related concerns. The school ensures that there is a clear reporting process in place should filtering systems flag any safeguarding or Prevent- related concerns. Online safety is integrated into the school's ICT and PSHE curriculum to equip pupils with the skills to stay safe online.				
		Unclear linkages between IT policy and the Prevent duty. No consideration of filtering as a means of restricting access to harmful content.	The DSL takes lead responsibility for safeguarding and child protection (including online safety).				
Visitors	External speakers or visitors being given a platform to radicalise children and young people or spread hateful or divisive narratives.	Leaders do not provide a safe space for children to learn.	A process is in place to manage site visitors, including sub-contractors. Content to pupils is checked by a member of leadership prior to delivery Visitors are not permitted to use USB sticks within school				
		Settings do not have clear protocols for ensuring that any visiting speakers are suitable and appropriately supervised.	The setting has a robust risk assessment and carries out due diligence checks on visitors, speakers, the organisations they represent and the materials they promote or share.				
		The setting does not conduct any due diligence checks on visitors or the materials they may use.	The private/commercial use of the institution's spaces is effectively managed & due diligence checks are carried out on those using/booking and organisations that they represent. The school seeks advice and support from partners where necessary to make an assessment of suitability.				