



Safeguarding Policy

CHARITY POLICY & PROCEDURE

Document Revised:	April 2026
Ratified by Trustees:	April 2026
Next Review Date:	October 2026

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Key Charity Safeguarding Contact Details

For each of the below staff you can contact them on 0191 2990111

Name	Position	Safeguarding Role*
Deirdre Pearson	Chief Executive Officer (CEO)	DSL
Stacy Murray	Acting Head Teacher	DSL
Lenny Lansbury	Pastoral Manager	DDSL
Karen Cowans	Family Liaison Officer	DDSL

***Designated Safeguarding Lead (DSL) & Deputy Designated Safeguarding Lead (DDSL)**

Key External Contact Details

Newcastle Local Authority Designated Officer (LADO)	0191 2774624
Local Authority Children's Social Care (LACSC)	0191 2788377
Multi-agency Safeguarding Hub	MASH Education Officer 07813683809
Police	Emergency: 999 Non-emergency: 101 Prevent - please refer to local safeguarding partnership arrangements Anti-terrorist hotline 0800 789 321
Disclosure and Barring Service (DBS)	Address: PO Box 3961, Royal Wootton Bassett, SN4 4HF customerservices@db.gov 03000 200190
OFSTED	whistleblowing@ofsted.gov.uk 0300 1233 155 (8am -6pm Mon-Fri)
NSPCC	Helpline is currently available 10am–4pm Monday to Friday: 0808 800 5000 help@NSPCC.org.uk completing our report abuse online form 18 or under? Childline offers free, confidential advice and support whatever your worry, whenever you need help. 0800 1111

Aims

Talbot House Children's Charity ("the Charity") defines Safeguarding as being broader than 'child protection.' Safeguarding in our school confirms what we do for all our pupils, applies across the whole school, and is linked to our overall culture, ethos, and the principles we follow in school. Safeguarding in our school is child centred and always ensures that we work in the best interests of the child to ensure that school is a safe place for all our pupils to be.

The Charity defines Child Protection as what we do for any pupils at risk of significant harm, or who have been significantly harmed.

The definition of a child (pupil) is defined as a person who is aged under 18 and includes an unborn child.

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 the risk of harm comes from within the child's family and / or outside (from the wider community), including online
- Preventing impairment to 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 and young people to have the best outcomes.

This policy has regard to the following guidance and advice:

- Keeping Children Safe in Education (DfE 2024) (Statutory guidance).
- Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children (DfE 2023 statutory guidance).
- Multi-agency statutory guidance on female genital mutilation (HM Government July 2020) (Statutory guidance).
- Relationships Education, Relationships and Sex Education (RSE) and Health Education (DfE September 2020) (Statutory guidance).
- Working together to improve school attendance (DfE 2024 statutory guidance).
- Children missing education (DfE September 2016) (Advice for schools).
- Statutory framework for the early years foundation stage (DfE 2021) (Statutory guidance)
- Revised Prevent duty guidance: for England and Wales (HM Government April 2021) (Statutory guidance).
- The Prevent duty: Departmental advice for schools and childcare providers (DfE June 2015) (Advice for schools).
- Information sharing: advice for practitioners (DfE 2024 non-statutory guidance).
- Guidance (non-statutory) for safer working practice for those working with children and young people in education settings. (Safer Recruitment Consortium February 2022).
- What to do if you're worried a child is being abused (HM Government March 2015).

This policy applies to all staff (to include agency staff), children, parents / carers, Trustees, Governors, volunteers and visitors. The Charity has two Designated Safeguarding Leads (DSLs), and two Deputy Designated Safeguarding Lead (DDSLs) who would lead in safeguarding matters (please see **Key Charity Safeguarding Contact Details** above for full details). The Charity make it clear that safeguarding is the responsibility of all staff. Please note DSLs and DDSLs will be referred to as DSLs throughout the policy.

1. Policy Statement

Safeguarding and promoting the welfare of children is of paramount importance and is the responsibility of every member of staff, Trustee and Governor, and regular visitor to our Charity, to ensure that they carry out the requirements of this policy and, at all times, work in a way that will safeguard and promote the welfare of all of the pupils at our school. This includes the responsibility to provide a safe environment in which our pupils can learn.

- We recognise that staff at our Charity play a particularly important role as they are in a position to identify concerns early and provide help for our pupils to prevent concerns from escalating.
- All staff are advised to maintain an attitude of 'it could happen here' where Safeguarding is concerned. When concerned about the welfare of a pupil, staff members must always act in the best interests of the pupil.
- Our Charity will establish and maintain an ethos where pupils are encouraged to talk, are listened to, and are safe. Pupils are able to talk freely to any member of staff at our Charity if they are worried or concerned about something.

- 1.1 All staff will, through training and induction, know how to recognise indicators of concern, how to respond to a disclosure from a pupil and how to record and report this information. We will not make promises to any pupil, and we will not keep secrets. Every pupil will know what the staff member will have to do with any information they have chosen to disclose.
- 1.2 Throughout our curriculum we will provide activities and opportunities for pupils to develop the skills they need to identify risks and stay safe. This will also be extended to include knowledge that will encourage our pupils to develop essential life skills.
- 1.3 At all times we will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from other agencies in line with Working Together to Safeguard Children (2023) and local safeguarding partners' procedures.
- 1.4 Safeguarding incidents and / or behaviours can be associated with factors outside the school and / or can occur between children outside of this environment. All staff, but especially a DSL should consider whether pupils 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) Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), sexual abuse, serious youth violence and County Lines (CL).

2. Procedures for Dealing with Concerns about a Pupil

All staff must report any concerns they have about a pupil, they should not dismiss concerns as insignificant.

- Staff should not assume a colleague, or another professional will take action and share the concern.
- On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this policy to allow the DSLs to build up a picture and access support for the pupil at the earliest opportunity.
- A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

- Staff must immediately report any:
 - Suspicion that a pupil is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play or everyday normal activities.
 - Explanation given which appears inconsistent or suspicious.
 - Behaviours which give rise to suspicions that a pupil may have suffered harm (e.g. worrying drawings, play, actions).
 - Concerns that a pupil may be suffering from inadequate care, ill treatment or emotional maltreatment.
 - Concerns that a pupil is presenting signs or symptoms of abuse or neglect.
 - Significant changes in a pupil's presentation, including non-attendance.
 - Hint or disclosure of abuse from any person.
 - Concerns regarding a person or persons who may pose a risk to pupils (children) (e.g. a person living in a household with children present).
 - Concerns about other staff, including concerns about safeguarding practices.

Children can sometimes show signs or act in ways they hope adults will notice and react to. All staff should be aware of this and remain vigilant with regards to our pupils.

2.1 What staff should do if a pupil is in danger or at risk of harm?

- If staff are concerned that a pupil could be at risk of harm, they must report to a DSL immediately. If this is not possible, they should make a direct referral to Local Authority Children's Social Care (LACSC).

2.2 What staff should do if they have a concern about 'Honour-Based' Abuse (HBA), including FGM, forced marriage etc.?

- If staff have a concern regarding a pupil who might be at risk of HBA or who has suffered from HBA, they should speak to a DSL.
- The DSL will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and LACSC.
- Where FGM has taken place, there is a specific mandatory reporting duty placed on Teachers. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon Teachers in England and Wales, to report to the Police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. Unless there is good reason not to do so, the teacher should also inform the DSL that they have contacted the Police.
- Further information can be found in the Multi-agency statutory guidance on female genital mutilation in Appendix D.

3. Responding to a Disclosure, Allegation or Information Received

Disclosures, allegations or information may be received from pupils, parents and / or carers or other members of the public. The Charity recognises that those who disclose such information may do so with difficulty, having chosen carefully to whom they will speak. Accordingly, all staff will handle disclosures with sensitivity, staff will:

- Listen to and take seriously any disclosure, allegation or information that a pupil may be at risk of harm.
- Try to ensure that the pupil or person disclosing does not have to speak to another member of school staff.

- Clarify the information.
- Try to keep questions to a minimum and of an 'open' nature e.g. 'Can you tell me what happened?' rather than 'Did x hit you?'.
- Try not to show signs of shock, horror or surprise.
- Not express feelings or judgments regarding any person alleged to have harmed the pupil.
- Explain sensitively to the person that they have a responsibility to refer the information to a DSL.
- Reassure the pupil that they will be taken seriously, supported and kept safe.
- Listen to and take into account (wherever possible) the child's wishes and feelings about the current situation as well as future plans.
- Ask any necessary questions to determine the pupil's wishes and feelings.
- Explain that only those who 'need to know' will be told.
- Explain what will happen next and how the pupil will be involved, as appropriate.
- Ensure there is appropriate support made available.
- Inform the DSL without delay and then complete a cause for concern on CPOMS.

3.1 A DSL should be used as a first point of contact for concerns and queries regarding any safeguarding concern in our Charity. Any member of staff (or School Visitor) who receives a disclosure of abuse, or suspects that a pupil is at risk of harm, must report it immediately to a DSL. In the unlikely absence of all DSLs, the matter should be brought to the attention of the most senior member of staff on site. DSLs will:

- Record all concerns about pupils in writing using CPOMS.
- Consider what action to take (following receipt of any information that raises concern, the DSL will and may seek advice from LACSC as required. All concerns, discussions, decisions made, and the reasons for those decisions will be recorded in writing.

It is not the responsibility of school staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on in accordance with these procedures.

- All referrals will be made in line with LACSC procedures.

3.2 If, at any point, there is a risk of immediate serious harm to a child, a referral should be made to LACSC immediately and if a criminal offence has been committed contact the Police. Anybody can make a referral. If a pupils situation does not appear to be improving, the staff member with concerns should press for re-consideration by raising concerns again with a DSL. Concerns should always lead to help for the pupil at some point.

- Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with LACSC, or the Police if:
 - The situation is an emergency, and all of the DSLs are unavailable.
 - They are convinced that a direct report is the only way to ensure the pupils safety.

3.3 Any member of staff, who does not feel that concerns about a pupil have been responded to appropriately, and in accordance with the procedures outlined in this policy, should raise their concerns with the Head Teacher in the first instance, alternatively they can raise this at the next level, if concerns are about the Head Teacher, to the CEO (or the Chair of Trustees, if concerns are about the CEO). If any member of staff does not feel the situation has been addressed appropriately at this point, then they should contact LACSC directly with their concerns.

3.4 Pupils with vulnerabilities

Staff should consider pupils who may be particularly vulnerable to abuse and may require early help. This could include pupils who:

- Have additional needs including pupils with Special Educational Needs and Disabilities (SEND).
- Are facing housing issues such as frequent moves and homelessness.
- Are living in families with chaotic lifestyles.
- Live with families with increased stress, parental mental ill health and / or drug and alcohol dependency.
- Are living elsewhere, with friends, relatives, privately fostered, in care or are leaving care.
- Are asylum seekers / refugees.
- May be vulnerable to discrimination on the basis of a protected characteristic.
- Are living in households with Domestic Abuse.
- Are at risk of so called 'Honour-Based' Abuse (HBA).
- Have communication difficulties.
- Are without adequate parenting / supervision which could lead to abuse, risk-related behaviour and sexual exploitation.
- Identify as LGBTQ+ will be provided with a safe space for them to speak out or share their concerns with members of staff.
- Is a young carer.
- Showing signs of being drawn into anti-social and / or criminal behaviour and / or involvement in gangs.
- Frequently misses from school / home / care home.
- Misuses drugs or alcohol.
- Is at risk of being radicalised.
- Is at risk of being exploited (criminal / sexual).
- Shows signs of neglect and abuse.
- Is at risk of modern slavery / trafficking.

This is not an exhaustive list but merely an example of vulnerabilities that staff must consider when identifying safeguarding concerns.

4. Early Help Assessment (EHA)

Early Help Assessment (EHA) is an organised early intervention to provide support as soon as a problem emerges at any point in a child's life.

- If an EHA is appropriate, a DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment, as appropriate.
- Staff may be required to support other agencies and professionals in an EHA and, in some cases, where education is the fundamental factor, act as the lead practitioner.
- EHA should be kept under review and referred to LACSC for assessment if the pupils situation does not appear to be improving or is getting worse.

4.1 Statutory Local Authority Children's Social Care (LACSC) Assessments and Services

Concerns about a pupils' welfare will be referred to the LACSC by a DSL. Where a pupil is suffering, or is likely to suffer from harm, a referral to LACSC (and if appropriate, the Police) will be made immediately. Referrals will follow the LACSCs referral process.

- All DSLs and senior staff should be aware of the requirement for pupils to have an appropriate adult present while being questioned by the Police.

- The appropriate adult will “support, advise and assist” the pupil, and also “observe whether Police Officers are acting properly and fairly to respect the pupils’ rights and entitlements. The appropriate adult will inform a Police Officer (who holds the rank of Inspector or above) if they consider that they are not” (further information can be found in the statutory guidance – PACE Code C 2019).
- Where a pupil in school has a Child in Need Plan or a Child Protection File, the school will liaise with LACSC, attend meetings and provide comprehensive and detailed reports, as required.
- All reports for Child in Need / Child Protection conferences will be prepared in advance, using the guidance and report template. The information contained in the report will be shared with parents before the conference as appropriate. In order to complete such reports, all relevant information will be sought from staff working with the pupil in school. All staff should be prepared to contribute to the report writing process.

5. Child-on-Child Abuse

Children can abuse other children. This is now referred to as child-on-child abuse and can take many forms. It can happen both inside and outside of school. Children concerned may attend two or more different schools.

- Child-on-child abuse will not be tolerated. All staff will take a zero-tolerance approach to any abusive behaviours and will stop and challenge inappropriate behaviours between pupils, which could be sexual in nature. We recognise that even if there are no reported cases of child-on-child abuse that such abuse may still be taking place, and all staff should be vigilant.
- A difficult feature of child-on-child abuse is that the perpetrators could be victims themselves and are possibly being abused by other family members, other adults and / or children. In cases where child-on-child abuse is identified we will follow our procedures for dealing with concerns, recognising that both the victim and perpetrator will require support.
- The Charity takes the following steps to minimise the risk of child-on-child abuse:
 - Promoting an open and honest environment where pupils feel safe and confident to share their concerns and worries.
 - Using the PSHE to educate and reinforce our messages through stories, role play etc.
 - Ensuring all areas within the school are well supervised, especially in areas where pupils may be vulnerable.
 - Ensuring staff are aware of the indicators and signs of child-on-child abuse and how to identify them.
 - Addressing inappropriate behaviour (even if it appears to be relatively minor).
 - Having clear robust policies for dealing with key issues of behaviour such as cyber bullying.
 - Ensuring staff and pupils are aware of our policies.
 - Increased supervision during key times.
 - Taking steps to prevent isolation.
 - Separating pupils if needed.
 - Putting in place an individual pupil risk assessment, where risk is identified.

5.1 The following is in place to enable children to confidently report any abuse:

- We have a strong Care Team, focused around making and maintaining strong positive relationships.

- All school staff are trained in communicating with pupils who have complex learning needs.
- School staff have experience, and training, in developing relationships with pupils to support them to feel safe and secure within school. This supports the creation of a safe environment where pupils are more likely to share worries and concerns (the importance of sharing worries and concerns is taught explicitly as part of the PSHE curriculum).
- All school staff have training and experience in Thrive, and the school has two Thrive Practitioners (Thrive is embedded across the school, supporting pupils to develop their ability to communicate effectively).

5.2 Each alleged incident of child-on-child abuse will be recorded (in writing, using CPOMs), investigated, and dealt with on an individual basis, based on the following principles:

- All pupils involved (victim and alleged perpetrator) will be spoken to separately by a DSL.
- Where the incident also involves a child at a different establishment a DSL will ensure effective communication and information sharing.
- All pupils involved (victims and alleged perpetrators) will be appropriately supported throughout the process.
- A DSL will balance the pupils' wishes against their duty to protect the pupil (and other children).
- The school will work with our local safeguarding partners where appropriate.
- A DSL may need to go against the victim's wishes and make a referral to LACSC or the Police (this will be handled sensitively, the reasons explained to the victim and appropriate support made available).
- Parents and / or carers will be informed of the incident and how their child will be dealt with (if appropriate) and supported (unless this could put the pupil at greater risk or impede a police investigation).

5.3 Victims, perpetrators, witnesses, and any other children affected by child-on-child abuse will be supported in the following ways (support will be tailored on a case-by-case basis).

- All pupils involved will be supported by an allocated member of staff.
- The needs and wishes of the victim will be taken into account, along with protecting the pupil.
- Wherever possible, the victim and witnesses will be able to continue their normal routine.
- The victim will never be made to feel they are the problem for making a report or made to feel ashamed for making a report.
- All reasonable steps will be taken to protect the anonymity of any pupils involved in any report of sexual violence or sexual harassment.
- Adequate measures will be put in place to protect pupils involved and keep them safe.
- A needs and risk assessment will be created, and a safety plan put in place when required.
- EHA, LACSC and other agencies will support where appropriate.

5.4 Research tells us girls are more frequently identified as being abused by other children, and girls are more likely to experience unwanted sexual touching in schools. Boys are less likely to report intimate relationship abuse. Boys report high levels of victimisation in areas where they are affected by gangs. There is increasing evidence base emerging about the sexual exploitation of boys (by other children as well as adults). We recognise that both

boys and girls experience child-on-child abuse but can do so in different ways. We recognise that child on child abuse can manifest itself in many ways such as:

- Child Sexual Exploitation (CSE) / Child Criminal Exploitation (CCE).
- Bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- Physical abuse.
- Radicalisation.
- Abuse in intimate friendships / relationships.
- Sexual violence and sexual harassment.
- Gang associated and serious violence.
- Initiation / hazing type violence and rituals.
- Consensual and non-consensual sharing of nude or semi-nude images and / or videos.
- 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.
- Upskirting (which is a criminal offence).

5.5 There are a number of factors that make some children more vulnerable to child-on-child abuse:

- Experience of abuse within their family.
- Living with domestic violence.
- Young people in care.
- Children who go missing.
- Children with additional needs (SEND).

Some of the reasons why children abuse other children are:

- A child may have been emotionally, physically, or sexually abused themselves.
- A child may have witnessed physical or emotional abuse.
- A child may have viewed sexually explicit / violent movies, video games or other materials.
- A child may have just acted impulsively without meaning to harm anyone.

Relationship abuse is unacceptable behaviour between any two people. All safeguarding incidents, concerns and / or allegations will be recorded on CPOMs.

6. Consensual and Non-consensual Sharing of Nude and Semi-nude Images and / or Videos

The term 'sharing nudes and semi-nudes' is used to mean the sending or posting of nude or semi-nude images, videos or live streams by children under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's Airdrop which works offline. The term 'nudes' is used as it is most commonly recognised by children and more appropriately covers all types of images and / or videos sharing incidents.

- The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by children who are in relationships, as well as between those who are not in a relationship. It is also possible for a child in a consensual relationship to be coerced into sharing an images and / or videos with their partner.
- Incidents may also occur where:
 - Children find nude or semi-nude images and / or videos online and share them claiming to be from another child.

- Children digitally manipulate an images and / or videos of a child into an existing nude online.
- Images created or shared are used to abuse other children e.g. by selling images online or obtaining images to share more widely without consent to publicly shame.
- The sharing of nude and semi-nude images and / or videos can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts.
- Nude or semi-nude images and / or videos or live streams may include more than one child.
- Creating and sharing nude and semi-nude images and / or videos of under-18s (including those created and shared with consent) is illegal which makes responding to incidents involving children complex.
- Many professionals may refer to nude and semi-nude images and / or videos ('nudes and semi-nudes') as:
 - Youth produced sexual imagery or 'youth involved' sexual imagery indecent imagery. This is the legal term used to define nude or semi-nude images and videos of children under the age of 18.
 - 'Sexting', many adults may use this term, however some children interpret sexting as 'writing and sharing explicit messages with people they know' rather than sharing images.
 - Image-based sexual abuse is a term that may be used when referring to the non-consensual sharing of nude and semi-nude images and / or videos.

6.1 Initial Response

When an incident involving nude and semi-nude images and / or videos comes to the attention of any member of staff:

- The incident will be referred to a DSL as soon as possible.
- A DSL will hold an initial review meeting with appropriate staff.
- There will be subsequent interviews with the pupils involved (if appropriate).
- Parents and / or carers will be informed at an early stage and will be involved in the process in order to best support their child unless there is good reason to believe that involving them would put the pupil at risk of harm).
- A referral will be made to LACSC and / or the Police immediately if there is a concern that a pupil has been harmed, or is at risk of immediate harm, at any point in the process.

A disclosure may not be a single event, and the pupil may share further information at a later stage.

6.2 Any direct disclosure by a pupil will be taken seriously. A pupil who discloses they are the subject of an incident of sharing nude and semi-nude images and / or videos is likely to be embarrassed and worried about the consequences. It is likely that a disclosure made in school is a last resort, and they may have already tried to resolve the issue themselves.

6.3 Initial Review Meeting will consider the initial evidence and aim to establish:

- Whether there is an immediate risk to any pupil.
- If a referral should be made to the Police and / or LACSC.
- If it is necessary to view the images and / or videos to safeguard the pupil (in most cases, images and / or videos should not be viewed without the agreement of the police).

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

A DSL will make an immediate referral to Police and / or LACSC through the MASH (Multi-Agency Safeguarding Hub), or equivalent, if at this initial stage:

- The incident involves an adult.
- There is reason to believe that a pupil has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs).
- What you know about the images and / or videos, suggests the content depicts sexual acts which are unusual for the pupils' developmental stage, or are violent.
- The images involve sexual acts, and any child in the images or videos is under 13.
- We have reason to believe a pupil is at immediate risk of harm owing to the sharing of nude or semi-nude images and / or videos, for example, they are presenting as suicidal or self-harming.

Our DSLs are aware of the requirement for children to have an appropriate adult while a child is being questioned by the police. The appropriate adult will “support, advise and assist” the child, and also “observe whether police are acting properly and fairly to respect the child’s rights and entitlements, and inform the Police Officer of the rank of inspector or above if they consider that they are not”. Further information can be found in the statutory guidance – PACE Code C 2019, which can be found at the following link:

<https://www.gov.uk/government/publications/pace-code-c-2019>.

If none of the above apply, the DSL may decide to respond to the incident without involving the Police or LACSC. They can still choose to escalate the incident at any time if further information / concerns are disclosed at a later date.

- A decision to respond to the incident without involving the Police or LACSC will only be made in cases where a DSL is confident that they have enough information to assess the risks to any pupils involved, and that the risks can be managed within the school’s support and disciplinary framework and, if appropriate, their local network of support.

6.4 Assessing the Risks

The circumstances of incidents can vary widely. If at the initial review stage, a decision has been made not to refer to Police and / or LACSC, a DSL should conduct a further review (including an interview with any pupils involved) to establish the facts and assess the risks. When assessing the risks and determining whether a referral is needed, the following should also be considered by the DSL involved:

- Why was the nude or semi-nude shared? Was it consensual or was the pupil put under pressure or coerced?
- Did the pupil send the nude or semi-nude images and / or videos to more than one person?

- Have the nude or semi-nude images and / or videos been shared beyond its intended recipient? Was it further shared without the consent of the pupil who produced the images and / or videos?
- How old are the pupils involved?
- Do you have any concerns about the pupils' vulnerabilities?
- Have the nude or semi-nude images and / or videos been shared on social media or anywhere else online? If so, what steps have been taken to contain the spread?
- Are there additional concerns, if the parents and / or carers are informed?

A DSL will decide whether a pupil is at risk of harm (in which case a referral will be appropriate), whether additional information or support is needed from other agencies, or whether the Charity can manage the incident and support any pupils directly. The DSL will always use their professional judgement, in conjunction with other DSLs, to assess incidents.

6.5 Supporting and Discussing the Incident with the Pupil Involved

A DSL (or another member of staff, with whom the pupil feels more comfortable talking to) will discuss future actions and support with the pupil. This discussion will take into account the views of the pupil, as well as balancing what are considered to be appropriate actions for responding to the incident. When discussing the sharing of nude or semi-nude images and / or videos, a DSL (or member of staff) will:

- Reassure the pupil that they are not alone, and that the Charity will do everything that it can, to help and support them.
- Reassure the pupil that they will be kept informed throughout the process.
- Recognise the pressures that pupils can be under to take part in sharing images and / or videos and, if relevant, support their parents and / or carers to understand the wider issues and motivations around this.
- Remain solution-focused and avoid any victim-blaming questions such as 'why have you done this?', as this may prevent the pupil from talking about what has happened.
- Always use open questioning such as 'can you describe what happened?' or 'can you explain who was involved?'.
- Help the pupil to understand what has happened by discussing the wider pressures that they may face and the motivations of any other persons that sent on the images and / or videos.
- Discuss issues of consent and trust within healthy relationships. Explain to the pupil that it is not okay for someone to make them feel uncomfortable, to pressure them into doing things that they do not want to do, or to show them things that they are unhappy about. Let the pupil know that they can speak to a DSL or any member of staff if this ever happens.
- Explain the law on the sharing of nude and semi-nude images and / or videos. It is important to highlight that the law is in place to protect children rather than criminalise them and should be explained in such a way that the information avoids alarming or distressing the pupil.
- Signpost pupils to the 'Internet Watch Foundation' (IWF) and Childline's 'Report Remove' tool. Report Remove allows children to report images and / or videos shared online, to see if it is possible to get images and / or videos removed (this must be done as soon as possible in order to minimise the number of people that are able to see the images and / or videos).

Staff are reminded that pupils can be involved in an incident in several different ways, they may:

- Lose control of their own images and / or or videos.
- Receive images and / or videos of someone else.
- Share images and / or videos of another person.

6.6 Informing Parents and / or Carers

In any of these situations, parents and / or carers may find it difficult to know how to deal with the knowledge that their child has been involved in an incident and may display differing emotions. Whatever their feelings, it is important that we listen to their concerns and take them seriously. We will also help to reassure parents and / or carers by explaining that it is normal for any child to be curious about sex. In all situations parents and / or carers will be:

- Given information (including advice on legislation) about the sharing of nude and semi-nude images and / or videos, what they can expect to happen next, and who will be their point of contact within the school.
- Given support on how to speak to their child about the incident.
- Given support to deal with their own feelings of upset and concern, including, where appropriate, signposting to further resources that can help them to understand the sharing of nude or semi-nude images or videos, or support services they can contact.
- Informed about sources of support for their child, in case they are feeling anxious or depressed about what has happened. This could include speaking to a Childline counsellor, online or on 0800 1111, school support, or a GP. If they are concerned that their child is suicidal, they should contact 999.
- Directed to NCA-CEOP if the child discloses any further details to them that may suggest they are being groomed or sexually exploited.
- Kept updated about any actions that have been taken, or any support that their child is accessing (unless the child involved has specifically asked for this not to happen and is judged to be old enough to make that informed decision).

6.7 Searching Devices, Viewing Nude and Semi-nude Images and / or Videos

Staff and parents and / or carers must not intentionally view any nude or semi-nude images or videos unless there is good and clear reason to do so as outlined below. Wherever possible, responses to incidents will be based on what a DSL has been told about the content of the images and / or videos. The decision to view any images and / or videos will be based on the professional judgement of the DSL. Images and / or videos will never be viewed if it is known that, or believed that, the images and / or videos are, or could be, illegal, or if the act of viewing will cause significant distress or harm to any pupils involved, in which case:

- Police advice must be sought before viewing of any images and / or videos.
- A record of the conversation must be recorded on CPOMS, to include the Police Officers name, number, date and time of the conversation and a record of advice, to include if they did, or did not, advise viewing the images and / or videos.

If a decision is made to view images and / or videos, the DSL would need to be satisfied that viewing is:

- The only way to make a decision about whether to involve other agencies because it is not possible to establish the facts from any pupil involved.
- Necessary to report it to a website, app or suitable reporting agency (such as IWF, to have the images and / or videos taken down), or to support the pupil or parent and / or carer in making a report.

- Unavoidable because a pupil has presented it directly to a staff member, or nude or semi-nude images and / or videos have been found on an education setting's device or network.

If it is necessary to view the images and / or videos, then the DSL will:

- Never copy, print, share, store or save the images and / or videos; this is illegal (if this has already happened, we will contact the local Police for advice and to explain the circumstances).
- Discuss the decision with the Head Teacher and / or the CEO (who are both DSLs).
- Ensure viewing is undertaken by a DSL with delegated authority from the Head Teacher and / or CEO.
- Ensure viewing takes place with another DSL present in the room (the second staff member does not need to view the images).
- Ensure wherever possible, viewing takes place on the school premises, in a private space, such as the Head Teachers Office or CEO Office.
- Ensure, wherever possible, that the images and / or videos 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 images /videos in the pupils child protection records. Details that must be recorded are who was present when viewing the images and / or videos, why the nude or semi-nude images and / or videos were viewed, and any subsequent actions (a copy of this record is kept on CPOMS).

If a device (or devices) needs to be passed onto the Police (where images and / or videos are known to be illegal, or are believed to be illegal content), it / they will be confiscated. The devices will be disconnected from Wi-Fi (airplane mode turned on wherever possible, and data will be turned off immediately, to avoid imagery being removed from the device and also removed from our cloud storage service). The devices will be placed in a secure place (in a locked cupboard) until the Police arrive / are able to collect it.

- Images and / or videos that are, or are believed to be, illegal content (rather than unpleasant and / or offensive), may constitute a criminal offence will never be deleted prior to seeking Police advice.
- Nude and semi-nude images and / or videos of our pupils (who are all under 18), or non-pupils who appear to be under 18 years old, would both fall into the category of illegal content. Nude / semi-nude images and / or videos of unidentified people (who may be adults) that have been sent to our pupils (who are under 18 years olds) would also fall into this category.

6.8 Staff Support if Nude or Semi-nude Images and / or Videos have been Viewed

If nude or semi-nude images and / or videos have been viewed by a member of staff (either following a disclosure from a pupil, or as a result of a member of staff undertaking their daily role, such as when monitoring school systems), a DSL (another DSL, or Manager) will make sure that the staff member is provided with appropriate support. Viewing nude or semi-nude images and / or videos can be distressing for both children and adults, and appropriate emotional support may be required.

6.9 Deleting Nude or Semi-nude Images and / or Videos

No images and / or videos will be deleted if they may constitute a criminal offence. However, where Police have advised that no criminal investigation is necessary, the pupil will be asked to delete the images and / or videos, and confirm that they have deleted it / them (to include being deleted from any 'recently deleted' files). Pupils will be:

- Given a deadline for deletion across all devices, online storage or social media sites.
- Reminded that possession of nude or semi-nude images and / or videos is illegal.
- Informed that if they refuse to, or it is later discovered they did not, delete the images and / or videos, they are continuing to commit a criminal offence, and that the Police may become involved (or involved again).

All incidents relating to nude or semi-nude images and / or videos being shared will be recorded using the school's procedures (on CPOMS). Copies of any nude or semi-nude images and / or videos should not be taken. It is important that pupils understand the Charity's policy towards nude or semi-nude images and / or videos. The content of this policy and the protocols, that the Charity will follow in the event of an incident, will be explored as part of teaching and learning. This will reinforce the inappropriate nature of abusive behaviours and reassure pupils that staff will support them if they experience difficulties or have concerns.

For more information, please see 'Sharing nudes and semi-nudes: advice for education settings working with children and young GOV.UK' (www.gov.uk).

7. 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'), e.g. accessing a computer network to look for test paper answers, or to change grades awarded.
- Denial of Service, attacks or 'booting'. These are attempts to make a computer, network, or website unavailable by overwhelming it with internet traffic from multiple sources.
- Making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and / or remote access trojans etc. with the intent to commit further offence, including those above.

- 7.1 Children with particular skills and interests in computing and technology may inadvertently, or deliberately, stray into cyber-dependent crime. If there are concerns about a pupil in this area, a DSL should consider referring to the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local Police. Cyber Choices aims to intervene where children are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.
- Note: Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Further additional advice can be found at: Cyber Choices, 'NPCC- When to call the police' and 'National Cyber Security Centre' (NCSC.GOV.UK).

8. Children with Special Education Needs and Disabilities (SEND) or Certain Health Issues

Children with Special Educational Needs or Disabilities (SEND) or certain health conditions can face additional safeguarding challenges. Children with SEND are three times more likely to be abused than their peers. Additional barriers can sometimes exist when recognising abuse in SEND children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- Children with SEND being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children.
- The potential for children with SEND or certain health issues being disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs.
- Communication barriers and difficulties overcoming these barriers.

Staff will support our pupils with SEND in expressing any concerns they may have and will be particularly vigilant to any signs or symptoms of abuse. The Assistant SENDCo (Victoria Jackson) and our other DSLs will work together when dealing with reports of abuse involving pupils with SEND.

9. Contextual Safeguarding / Extra Familial Harm

Safeguarding incidents and / or behaviours can be associated with factors outside of school and / or can occur between our pupils and children outside of our school. All staff should be considering the context within such incidents and / or behaviours that occur. This is known as contextual safeguarding, which simply means 'assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and / or welfare'.

The table below outlines some contextual safeguarding factors that we consider:

Geographical Factors	Response
Some of our pupils have to travel significant distances to access school.	Many of our pupils will always require adult support to travel safely, however some pupils have the capacity to travel independently. The school delivers a travel training programme as part of its curriculum. The travel training programme ensures that pupils understand the dangers and risks associated with independent travel and supports them to learn strategies and approaches to minimise those risks.
Social and Economic Factors	Response
Pupils with learning difficulties are recognised as being more at risk of exploitation and can unknowingly become involved in illegal or criminal activities.	We teach pupils about personal safety and making the right decisions to keep themselves safe, regarding their behaviour during and beyond school. The PSHE curriculum delivers units on crime and the law and is delivered at a level appropriate to the needs of our pupils. This is supported through links with other curriculum areas, developing the pupils' understanding of exploitation and the concept of right and wrong.

Peer Group Factors	Response
Pupils with learning difficulties may seek friendships with others who are cognitively and socially more able. This can lead to pressure to take part in activities which are intrinsically unsafe or unsafe for that pupil.	Our curriculum teaches our pupils about the issue of 'peer pressure'. Pupils engage in different scenarios and are given choices to make through role play. Pupils are taught to be confident and assertive through our full curriculum and through Thrive. The pupils most at risk are often our most able cohort. Peer pressure and the possible outcomes are addressed explicitly in the preparing for adulthood curriculum. We encourage any pupil who is feeling pressurised to talk to familiar staff in school, particularly our Care Team.
Home Factors	Response
Lots of our pupils are connected to the internet at home and regularly use gaming devices to engage in online games with their friends / others.	Through our PSHE curriculum and IT curriculum, pupils are taught about online safety. This is repeated regularly throughout school and is presented in a range of ways to meet the needs of a wide range of learners. The school responds to situations by providing tailored support to individuals or groups. All school staff have regular training in on-line safety. There are a team of staff within school who have received training in on-line safety and who are able to provide support and guidance to staff, pupils, parents / carers. We provide and share information to parents / carers through a range of forums: the Charity website, Charity social media page, handouts available in school and information for parents.

10. Recording, Record Keeping and Information Sharing

All concerns, discussions and decisions made, and the reasons for those decisions, will be recorded in writing on the agreed reporting on CPOMS. Each record should include:

- A clear and comprehensive summary of the concern.
- Details of how the concern was investigated, followed up and resolved.
- Information from any pupils, written verbatim.
- A note of each action taken, decisions reached and the outcome.
- Date and signature of who completed the record.

If there is any doubt about recording requirements, staff should discuss with a DSL.

10.1 Child Protection information is recorded on CPOMS. Information can only be viewed by those who are required to view it to ensure that they can carry out their child protection responsibilities. This includes DSLs (one of whom is also the Family Liaison Coordinator). At times paper-based records will be required. These will be kept in a separate Child Protection file for each child, stored in a separate secure cabinet. Only child protection information will be kept in the file and this file will be kept up to date. Records of concern, copies of referrals, invitations to child protection conferences, core groups and reports will be stored here or on CPOMS. All Child Protection files will include a chronology, a contents front cover and will record significant events in the pupils life.

- Child Protection files are the responsibility of a Head Teacher.
- Child Protection information will only be shared with relevant staff and / or agencies, in the pupils interests, and on the understanding that it remains strictly confidential.

10.2 When a pupil leaves our school, a DSL will make contact with a DSL at the pupils new school and will ensure that the Child Protection file is forwarded to the receiving school or college in an agreed secure manner.

- This should be as soon as possible and within 5 days for an in-year transfer, or within the first 5 days at the start of a new term to allow the school or college to have support in place for when a child arrives.
- We will retain evidence to demonstrate we have acted accordingly when dealing with safeguarding matters and how the file has been transferred; this may be in the form of electronic records via CPOMS audit features, or a written confirmation of receipt from the receiving school or college and / or evidence of recorded delivery.
- Where a parent and / or carer elects to remove their child from the school roll to home educate, the school will make arrangements to pass any child protection information (safeguarding concerns) to the LACSC.

11. Procedures for Dealing with Concerns about Staff

If staff have safeguarding concerns, or an allegation of abuse is made about another member of staff (including supply staff, volunteers and contractors, collectively referred to as staff within this section), posing a risk of harm to a pupil or pupils, this should be reported to the Head Teacher. However, if it is a low-level concern this should be reported to a DSL. Where there are concerns about the Head Teacher this should be referred to the CEO. Where there are concerns about the CEO this should be referred to the Chair of Trustees.

11.1 What staff should do if they have concerns about safeguarding practices within the school
The school will maintain a safeguarding culture which encourages all staff to feel able to raise concerns.

- Where staff have concerns about poor or unsafe practice and potential failures in the safeguarding systems, these should be raised internally with their Line Manager or if they do not feel they can do this, by following the **Whistleblowing Policy**.
- Where a staff member feels unable to raise an issue with the school, or feels their genuine concerns are not being addressed, other whistleblowing channels are available, such as the NSPCC whistleblowing advice line. Contact details are on the Key External Contacts page.

11.2 Allegations that Meet the Harm Threshold

All allegations will be investigated thoroughly and as a matter of urgency. They will be dealt with quickly, fairly and consistently. Protection will be provided for the pupil, and the member of staff subject to the allegation will be supported.

- We will always ensure that the procedures outlined in the local authority arrangements for managing allegations and Part 4 of 'Keeping Children Safe in Education', DfE are adhered to and where appropriate, we will seek advice from the LADO.
- Allegations that might indicate a member of staff will pose a risk of harm if they continue to work in their present position, or in any capacity with our pupils would apply when staff (including volunteers and supply staff) have (or alleged to have):
 - Behaved in a way that has harmed a pupil or may have harmed a pupil.
 - Possibly committed a criminal offence against or related to a pupil.
 - Behaved towards a pupil or pupils in a way that indicates they may pose a risk of harm to children.
 - Behaved or may have behaved in a way that indicates they may not be suitable to work with children (this last bullet point includes behaviour that may have happened outside of school, that might make an individual unsuitable to work with

children, this is known as transferable risk. Where appropriate, an assessment of transferable risk to children with whom the person works will be undertaken. If in doubt we will seek advice from the LADO).

- 11.3 When an allegation is made against a member of staff that meets the above criteria it should be reported immediately to the CEO and / or Head Teacher, who will become the 'Investigating Officer (IO)' (this role is known as the 'Case Manager' within KCSiE).
- This includes allegations made against staff, agency staff, contractors, volunteers and visitors.
 - In the event that neither the Head Teacher nor CEO is contactable on that day, the information must be passed to and dealt with by either a different DSL, Manager or if required, the Chair of Trustees.
 - The IO will conduct basic enquiries in line with local procedures and KCSiE to establish the facts to help determine whether there is any foundation to the allegation, being careful not to jeopardise any future Police investigation.
 - If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion involving the Police and / or LACSC will be convened. Cases of suspected abuse will be referred to LACSC.
 - The Investigating Officer will:
 - Immediately discuss with the LADO, the nature, content and context of the allegation and agree a course of action. Where the IO deems there to be an immediate risk to our pupils (children) or a criminal offence has been committed, the Police will be contacted immediately. All discussions, agreed actions, and communications will be recorded in writing. The LADO should be informed within one day of any allegations made to the IO and any actions taken. If the initial discussion leads to no further action, the IO and the LADO will record the decision and justification for it and agree on what information should be put in writing to the individual concerned.
 - Ensure that the individual who is subject to the allegation is informed as soon as possible explaining the likely course of action guided by the LADO, and the Police where necessary.
 - Appoint a named representative to keep the person informed about the progress of the case and consider any appropriate support
 - Ensure that parents of the pupil or pupils involved are formally told about the allegation as soon as possible and kept informed of the progress of the case, only in relation to their child. They will be made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in schools whilst investigations are in progress.
 - Monitor the progress of the case to ensure that it is dealt with as quickly as possible in a thorough and fair process.
 - Carefully consider whether the circumstances warrant suspension from contact with pupils, or until the allegation is resolved. It will be considered only in cases where there is cause to suspect a child or other children at the school is/are at risk of harm, or the case is so serious it might be grounds for dismissal. The IO will seek views from HR and the LADO, as well as the Police and LACSC where they have been involved. Where an individual is suspended they will be provided with a named contact in Charity.
 - Discuss with the LADO whether a referral to the Disclosure and Barring Service (DBS) and / or the Teaching Regulation Agency (TRA) should be made where an allegation is substantiated and the person is dismissed, or the Charity ceases to

use their services, or the person resigns or otherwise ceases to provide their services. The Charity has a legal obligation to make a referral to the DBS for consideration of whether inclusion on the barred lists is required; where it considers an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person poses a risk to a child. In the case of a member of teaching staff, the IO must consider making a referral to the TRA to consider prohibiting the individual from teaching.

- If an allegation is made against an agency worker (Teacher or Support Staff), contractor, or visitor, the IO will liaise closely with the agency involved. The IO will ensure that any allegations are dealt with following the Charity's procedures and in liaison with the LADO.
- If an allegation is made against a Trustee or Governor, the IO will follow LACSC arrangements for managing allegations, liaising with the LADO.

For all other allegations a written record of details of the investigation and the outcome will be retained in the staff personnel file in line with KCSiE.

11.4 Allegation Outcomes

In cases where allegations are proven to be unsubstantiated, unfounded, false or malicious the LADO and IO will consider whether the person who made the allegation is in need of help or may have been abused by someone else and this is a cry for help. A referral to LACSC may be deemed appropriate. Allegations proven to be unsubstantiated, unfounded, false or malicious will not be included in employer references.

- The Charity will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.
- On conclusion of a case in which the allegation is substantiated, the IO and the LADO will review the case to determine whether there are any improvements to be made to the school's procedures or practices to help prevent similar events in the future.
- Allegations against a Teacher who is no longer teaching should be referred to the Police.
- Non-recent allegations of abuse should be reported to the LADO who will liaise with other agencies.
- Abuse can be reported no matter how long ago it happened.

11.5 Low-level concerns

All concerns about all members of staff (or on behalf of the Charity including supply teachers, volunteers and contractors) will be dealt with promptly and appropriately.

- The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a pupil does not meet the criteria indicated in the allegations section above. A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a nagging doubt. A member of staff may have acted in a way that does not meet the expectation in the **Code of Conduct (Staff)**, including conduct outside of the workplace and does not meet the allegations criteria or is not considered serious enough to refer to the LADO.
- Such behaviour can exist on a wide spectrum; examples could include, but are not limited to:
 - Being over friendly with pupils.
 - Having favourites.
 - Taking photographs of pupils on their mobile telephone.
 - Using inappropriate language.
 - Becoming 'friends with or connecting with pupils or their families on social media.

- Low-level concerns about a member of staff should be reported immediately to the Head Teacher / CEO. Where the concern is about the Head Teacher it should be reported to the CEO. Where the concern is about the CEO it should be reported to the Chair of Trustees.
- Low-level concerns about an agency staff (Teacher or Support Staff) or contractor or visitor should be reported as above. The Head Teacher / CEO will notify the employer so that any patterns of inappropriate behaviour can be identified.
- All low-level concerns will be recorded by the Head Teacher / CEO / HR Manager and stored securely and confidentially. These records will be reviewed so that any patterns of inappropriate behaviour can be identified and dealt with.

12. Safer Working Practice

All staff (to inc. agency, etc. and collectively referred to as staff within this section) have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of our pupils. They should adopt high standards of personal conduct in order to maintain confidence and respect of the general public and those with whom they work.

- All staff will be provided with a copy of the **Code of Conduct (Staff)** at induction which sets out the Charity's expectations of staff behaviour. We review our **Code of Conduct (Staff)** regularly and ask staff to ensure that they are familiar with the current version. Staff are expected to carry out their duties in accordance with the **Code of Conduct (Staff)**.
- There will be occasions when some form of physical contact is inevitable, for example if a pupil has an accident or is hurt or is in a situation of danger to themselves or others around them. However, at all times the agreed procedures for positive handling must be adhered to.
- If staff are working with pupils alone they must ensure they are visible to other members of staff. They will be expected to inform another member of staff of their whereabouts in school, who they are with and for how long. Doors, ideally, should have a clear glass panel in them and be left open. Staff should be aware of locations of CCTV cameras and ensure they are visible whenever possible and can raise a radio call if working on their own for a period of time, if required.
- Staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.

Further advice can be found in 'Guidance for safer working practices for adults who work with children and young people in education settings', which can be found at this link: <https://www.virtual-college.co.uk/guidance-for-safer-working-practice-2022.pdf>. All staff are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

13. Safer Recruitment

We will ensure that, as a minimum, the CEO, Head Teacher and HR Manager have completed appropriate safer recruitment training. At all times the CEO, Head Teacher and HR Manager will ensure that safer recruitment practices are followed in accordance with the requirements of 'Keeping Children Safe in Education', DfE. The Charity will follow safer recruitment practices and procedures when making decisions about the suitability of prospective staff. This will include:

- Conducting the relevant checks, including an on-line search which may help identify any incidents or issues that have happened, and are publicly available online, which the school may want to explore with the applicant at interview.

- Obtaining appropriate references.
- Retaining information from interviews.
- Retaining all safer recruitment checks carried out in line with statutory requirements.
- Maintaining a Single Central Record.

Please refer to our **Safer Recruitment Policy** for full details.

13.1 Contractors, and / or volunteers working with Pupils and / or visitors who be working with our pupils when at the Charity

The Charity has clear protocols for contractors / volunteers / visitors (referred to collectively as 'visitors' for this section of the policy) to ensure they are suitable and supervised as appropriate.

- All visitors, who will be working with our pupils, will be expected to confirm they have an appropriate DBS and will be asked to show photo ID on arrival. The school will keep a record of all visitors. Visitors who do not provide appropriate DBS clearance will be accompanied by staff at all times.

14. Managing Safeguarding

The Trustees and Governors are accountable for ensuring the effectiveness of this policy and our compliance with it. Although our Trustees and Governors take collective responsibility to safeguard and promote the welfare of our pupils, we also have a Link Governor who champions safeguarding within the school.

- The Charity will ensure that all Trustees and Governors receive appropriate safeguarding and child protection training. This training will equip them with the knowledge to provide strategic challenge, to test and assure themselves that the safeguarding policies and procedures in place are effective. The training will be regularly updated.
- The Trustees and Governors will receive an annual safeguarding report that will detail the training that has taken place and will inform the Board of Trustees how the school meets its statutory requirements.
- The Trustees and Governors will undertake a range of safeguarding visits over the year to monitor safeguarding compliance.

14.1 The Trustees and Governors will ensure that:

- This **Safeguarding Policy** is in place and is reviewed annually, is available via our school website and has been written in line with the requirements of local safeguarding partners' policies and procedures.
- The Charity contributes to inter-agency working in line with 'Working Together to Safeguard Children' (2023).
- The Charity is compliant with online safety legislation by regularly reviewing the effectiveness of filters and monitoring systems.
- They uphold the obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements. Including, not unlawfully discriminating against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).
- The CEO and Head Teacher (both DSLs) are designated to take the lead responsibility for safeguarding and child protection and that there are two DDSs (the Deputy Head Teacher and Family Liaison Coordinator) who are appropriately trained.
- All staff receive a safeguarding induction and are provided with a copy of this policy and the **Code of Conduct (Staff)** prior to, or during, induction.

- All staff undertake appropriate Safeguarding training that is updated regularly, at least annually.
- Procedures are in place for dealing with allegations against members of staff, volunteer and contractors etc., in line with statutory guidance.
- Safer recruitment practices are followed in accordance with the requirements of 'Keeping Children Safe in Education' DfE.
- Trustees and Governors will remedy, without delay, any weakness regarding our safeguarding arrangements that are brought to their attention.

14.2 The Charity ensures:

- We have suitably trained and experienced DSLs (and DDSLs).
- That the policies and procedures adopted by the Board of Trustees, particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff.
- That all staff feel able to raise concerns.
- Liaise with the Local Authority Designated Officer (LADO) in the event of an allegation of abuse being made against a member of staff.

14.3 14.4 The Designated Safeguarding Leads (DSLs) and the Deputy Designated Safeguarding Leads (DDSLs)

- All DSLs will carry out their role in accordance with the responsibilities outlined in the 'Keeping Children Safe in Education' DfE document. The DSLs will provide advice and support to other staff on child welfare and child protection matters. Any concern for a child's safety or welfare will be recorded on CPOMS. DSLs are automatically alerted to these.
- During term time the DSL will always be available (during school hours) for staff to discuss any safeguarding concerns. If in exceptional circumstances, a DSL is not available in person, we will ensure that they are available via telephone and any other relevant media.
- DSLs will:
 - Manage referrals and will refer cases of suspected abuse to the LACSC and refer cases to the prevent and / or Channel programme (as appropriate), if there is a radicalisation concern.
 - Be equipped to attend and contribute to child protection case conferences, strategy discussions and other interagency meetings, through regular training, knowledge and experience.
 - Maintain detailed, accurate written records and child protection files ensuring that they are kept confidential and stored securely.
 - Transfer child protection files separately from the main pupil file, in line with deadlines set out within this policy.
 - Ensure that all staff members and volunteers are aware of the Charity's **Safeguarding Policy** and the procedures they need to follow. They will ensure that all staff, volunteers and regular visitors have received appropriate Safeguarding information during induction from a DSL / DDSL.
 - Help to promote educational outcomes by sharing information about the issues that children, including children with a social worker, are experiencing, or have experienced, with Teachers and Senior Staff.

14.5 Opportunities to Teach Safeguarding - Pupils

We will teach children how to keep themselves safe, including in relation to contextual factors.

- Preventive education is most effective in the context of a whole school approach that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny / misandry, homophobia, biphobia and sexual violence / sexual harassment. This will be underpinned by our **Behaviour Management Policy**, as well as by a planned programme of evidence-based RSHE / RE delivered and reinforced throughout the whole curriculum.
- The broad range of needs within our pupil population requires the curriculum to be highly personalised in all aspects, including the teaching and delivery of RSHE, on-line safety and broader safeguarding themes including the prevention of radicalisation. There is a focus on support and pupil welfare, including within all curriculum areas. Keeping safe is taught explicitly through the relationship and sex education curriculum at all ages.

15. Training and Induction

All new members of staff (to include agency staff) will be informed of safeguarding procedures, including the recording and reporting procedures as part of their induction process (from a DSL / DDSL).

- They will receive this **Safeguarding Policy** and online safeguarding training at induction and / or within the first half term of joining the school. This policy will include information relating to signs and symptoms of abuse, how to manage a disclosure from a pupil, how to record concerns and the role of a DSL. The policy will also include information about whistleblowing in respect of concerns about another adult's behaviour and suitability to work with children.
- All school staff will receive online safety information from a DSL during induction.
- In addition to the safeguarding induction, we will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one of 'Keeping Children Safe in Education' DfE.
- In order to achieve this, we will ensure that:
 - All members of staff will undertake appropriate safeguarding training on an annual basis, including online safety.
 - We will evaluate the impact of this training.
 - All members of staff receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings), as required, but at least annually, to provide them with the relevant skills and knowledge to safeguard children effectively.
- The DSLs, who may be in a position of making referrals or attending child protection conferences or core groups, will attend appropriate training.
- We actively encourage all of our staff to keep up to date with the most recent local and national safeguarding advice and guidance, Appendix B of 'Keeping Children Safe in Education' provides links to guidance on specific safeguarding issues. In addition, throughout the school year we will brief staff on key issues identified by the school.
- All staff are expected to read these key documents and fully understand their responsibility to keep children safe:
 - Part One and Appendix B of 'Keeping Children Safe in Education' DfE.
 - Safeguarding Policy.
 - Allegations Policy.
 - Behaviour Management Policy.

- Code of Conduct (Staff).
- Whistleblowing Policy.
- Registration and Attendance Policy (Missing in Education section).
- Role of the DSLs (including the identity of the DSL and any deputies).

16. Working with Parents and / or Carers

The Charity is committed to working in partnership with parents and / or carers to safeguard and promote the welfare of our pupils and to support them to understand our statutory responsibilities in this area.

- When new pupils join our school, parents and carers will be informed that we have a safeguarding policy. A copy will be provided to parents on request and is available on our website. Parents and carers will be informed of our legal duty to assist our colleagues in other agencies with child protection enquiries and what happens should we have cause to make a referral to LACSC.
- We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission, or it is necessary to do so in order to safeguard a child from harm or support a child's wellbeing.
- We will seek to share with parents any concerns we may have about their child unless to do so may place a child at increased risk of harm. A lack of parental engagement or agreement regarding the concerns the school has about a child will not prevent the DSL making a referral to LACSC in those circumstances where it is appropriate to do so.
- In order to keep children safe and provide appropriate care for them, the school requires parents to provide accurate and up to date information regarding:
 - Full names and contact details of all adults with whom the child normally lives.
 - Full names and contact details of all persons with parental responsibility (if different from above).
 - Emergency contact details (if different from above); wherever possible school will hold more than one emergency contact for each pupil.
 - Full details of any other adult authorised by the parent to collect the child from school (if different from the above).
- The school will retain this information on the children's file. The school will only share information about children with adults who have parental responsibility for a child or where a parent has given permission, and the school has been supplied with the adult's full details in writing. If in any doubt about information sharing, staff should speak to the DSL. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

17. Relevant Policies

To underpin the values and ethos of our Charity and our intent to ensure that our pupils are appropriately safeguarded, the following policies are also included under our safeguarding umbrella:

- Acceptable Use of Charity Interview, ICT Systems and Equipment Agreement
- Allegations.
- Anti-bullying (Pupils).
- Behaviour Management.
- Cyberbullying.
- Data Protection.
- E-Safety.

- Equal Opportunities (Pupil).
- Equal Opportunities (Staff).
- Health and Safety.
- Intimate Care.
- Keeping Children Safe in Education (KCSiE)
- Registration & Attendance.
- Relationships, Sex & Health Education (Primary).
- Relationships, Sex & Health Education (Secondary).
- Safer Recruitment.
- Supporting Pupils with Medical Conditions.

18. Review

This policy is subject for review at any time, in line with recommended changes and may be subject for review prior to the date shown if deemed necessary, however, this policy is usually reviewed on an annual basis. The Head Teacher will be responsible for reviewing this policy. Following every review, the policy will be shared with the Board of Trustees.

Appendix A: Abuse And Neglect

Indicators of abuse and neglect

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing 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. We recognise that children are also vulnerable to physical, sexual and emotional abuse by their peers or siblings (see Child-on Child Abuse – section 5).

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

Sexual Abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of our Charity policies and procedures for dealing with it.

Emotional Abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development.

It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child 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, though it may occur alone. We recognise that children with Special Educational Needs and Disabilities (SEND) can face additional safeguarding challenges, and these are discussed in staff training.

These additional barriers can include:

- Assumptions that indicators of possible abuse such as how behaviour, mood and injury relate to the child's disability without further exploration.
- Children with SEND can be disproportionately impacted by things like bullying, without outwardly showing any signs.

- Communication barriers and difficulties in overcoming these barriers.

Neglect is the persistent failure to meet a child's basic physical and / or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food and clothing, shelter (including exclusion from home or abandonment).
- Protect a child from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate caretakers).
- Ensure access to appropriate medical care or treatment.
- Ensure suitable education.
- Ensure a child's basic emotional needs (includes the neglect of, or unresponsiveness to a child's basic emotional needs).

Appendix B: Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

We know that different forms of harm often overlap and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including County Lines) and sexual exploitation. In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and / or will be to the financial benefit or other advantage. Children can be exploited by adult males or females, as individuals or groups.

They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim. Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status and access to economic or other resources.

Some of the following can be indicators of both CCE and CSE where children:

- Appear with unexplained gifts, money or new possessions.
- Associate with other children involved in exploitation.
- Suffer from changes in emotional well-being.
- Misuse drugs and alcohol.
- Go missing for periods of time or regularly come home late.
- Regularly miss school or education or do not take part in education (pupils who have been exploited will need additional support to help maintain them in education).

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through County Lines (CL), working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening to, or 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. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

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.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation,

kissing, rubbing, and touching outside clothing. It may include non-contact 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 occur over time or be a one-off occurrence, can range from opportunist to complex organised abuse and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. It 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 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.

Some children may not realise they are being exploited for example; they believe they are in a genuine romantic relationship. The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist professionals in identifying children who may be victims of sexual exploitation.

Signs include:

- Underage sexual activity.
- Inappropriate sexual or sexualised behaviour.
- Sexually risky behaviour, for example, swapping sex for monetary payment.
- Repeated sexually transmitted infections.
- In girls, repeated pregnancy, abortions, miscarriage.
- Having multiple mobile phones and worrying about losing contact via mobile telephone.
- Having unaffordable new things (clothes, mobile phone) or expensive habits (alcohol, drugs).
- Changes in the way they dress.
- Going to hotels or other unusual locations to meet friends.
- Seen at known places of concern.
- Moving around the country, appearing in new towns or cities, not knowing where they are.
- Getting in / out of different cars driven by unknown adults.
- Having older boyfriends or girlfriends.
- Contact with known perpetrators.
- Involved in abusive relationships, intimidated and fearful of certain people or situations.
- Hanging out with groups of older people, or anti-social groups, or with other vulnerable peers.
- Recruiting other children into exploitative situations.
- Unexplained changes in behaviour or personality (chaotic, aggressive, sexual, mood swings, volatile behaviour and / or emotional distress).
- Self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders.
- Getting involved in crime / police involvement, police records.
- Involved in gangs, gang fights, gang membership.
- Injuries from physical assault, physical restraint and / or sexual assault.

Appendix C: County Lines (CL)

County Lines (CL) 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 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 CL in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes. Children are also increasingly being targeted and recruited online using social media.

Children can easily become trapped by this type of exploitation as CL 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 CL network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in CL. Some additional specific indicators that may be present where a child is criminally exploited through involvement in CL are children:

- Who persistently go missing from home or school and subsequently found in areas away from their home.
- Receive excessive calls and text messages.
- Who are in relationships with older, controlling individuals.
- Who are associated with gangs.
- Who are under suspicion of self-harm, physical assault or unexplained injuries.
- With parental concerns.
- Who show a significant decline in school performance.
- Who demonstrate significant changes in emotional wellbeing.
- Have been the victim or 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.
- Who owe a ‘debt bond’ to their exploiters.
- May have had their bank accounts used to facilitate drug dealing.
- Who have received unexplained gifts or new possessions.

Serious violence

All staff should be aware of the indicators, which may signal pupils are at risk from, or are involved with serious violent crime. These may include:

- Increased absence from school.
- A change in friendships or relationships with older individuals or groups.
- A significant decline in performance.
- Signs of self-harm or a significant change in wellbeing.
- Signs of assault or unexplained injuries.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as:

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

Appendix D: So-called ‘Honour-Based’ Abuse

So-called ‘Honour-Based’ Abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and / or the community, including:

- Female Genital Mutilation
- Forced Marriage
- Breast Ironing

Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of these dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to a DSL. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Female Genital Mutilation (FGM)

FGM involves procedures that intentionally alter / injure the female genital organs for non-medical reasons. There are four types of procedure, as detailed below:

Type 1	Type 2	Type 3	Type 4
Clitoridectomy: Partial / total removal of clitoris.	Excision: Partial / total removal of clitoris and labia minora.	Infibulation: Entrance to vagina is narrowed by repositioning the inner / outer labia.	All other procedures that may include pricking, piercing, incising, cauterising and scraping the genital area.

Why is it carried out?

FGM is carried out because it is believed by some religions / countries that FGM:

- Brings status / respect to the girl – social acceptance for marriage.
- Preserves a girl’s virginity.
- Is part of being a woman / rite of passage.
- Upholds the family honour.
- Cleanses and purifies the girl.
- Gives a sense of belonging to the community.
- Fulfils a religious requirement.
- Perpetuates a custom / tradition.
- Helps girls be clean / hygienic.
- Is cosmetically desirable.
- Makes childbirth easier (mistakenly).

FGM is internationally recognised as a violation of human rights of girls and women. It is illegal in most countries, including the UK.

Circumstances and occurrences that may point to FGM happening, can include

- A child talking about getting ready for a special ceremony.
- A family taking a long trip abroad.
- A child’s family being from one of the ‘at risk’ communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghanistan, Kurdistan, Indonesia and Pakistan).

- Knowledge that the child's sibling or other close female relative has undergone FGM.
- If a child talks about going abroad to be 'cut' or to prepare for marriage.

It is important to note that FGM happens in the UK; it is now less common for families to travel overseas for the purpose of FGM.

Signs that may indicate a child has undergone FGM, can include:

- Prolonged absence from school and other activities.
- Behaviour changes on return from a holiday abroad / period of absence, such as being withdrawn and appearing subdued.
- Bladder or menstrual problems.
- Finding it difficult to sit still and looking uncomfortable
- Complaining about pain between the legs.
- Mentioning something that somebody did to them that they are not allowed to talk about.
- Secretive behaviour, including isolating themselves from the group.
- Reluctance to take part in physical activity.
- Repeated urinary tract infections.
- Disclosure.

Forced Marriage

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

- Where a person does not consent or where they cannot consent (if they have learning disabilities, for example).
- The use of religion and culture (by some communities) as a way to coerce a person into marriage.

School can play an important role in safeguarding pupils from forced marriage.

Signs and symptoms may include:

- Children may appear anxious, depressed and emotionally withdrawn with low self-esteem.
- They may have mental health disorders and display behaviours such as self-harming, self-cutting or anorexia.
- Sometimes they may come to the attention of the police having been discovered shoplifting or taking drugs or alcohol.
- Often children's symptoms can be exacerbated in the periods leading up to the holiday season.
- Children may present with a sudden decline in their performance, aspirations or motivation.
- They may be subject to excessive restrictions and control at home.
- Some children may not be allowed to attend any extra-curricular or after-school activities.
- Girls and young women may be accompanied to and from school, and even during lunch breaks.
- Some children may stop attending school.
- Their homework is incomplete or appears rushed (this may be the result of being actively discouraged from doing it by family members).

- Children may do their homework late at night, which frequently shows in school because they are lethargic, unable to concentrate and have a general appearance of tiredness.
- Professionals being told that the child is out of the country.
- There are occasions when older siblings (usually brothers) and cousins keep a close eye on girls to make sure that they do not meet anyone or talk to friends.
- Conflict between the child and their parents about whether the child will be allowed to continue their education.
- Family history of older siblings leaving education early and marrying early.

Breast Flattening or Breast Ironing

Breast Flattening or Breast Ironing is “the process during which young pubescent girls’ breasts are ironed, massaged, flattened and/or pounded down over a period of time (sometimes years) in order for the breasts to disappear or delay the development of the breasts entirely.”

- In some families, large stones, a hammer or spatula that have been heated over scorching coals can be used to compress the breast tissue. Other families may opt to use an elastic belt or binder to press the breasts so as to prevent them from growing.
- Breast flattening usually starts with the first signs of puberty, which can be as young as nine years old and is usually carried out by female relatives.
- It should also be acknowledged that some adolescent girls and boys may choose to bind their breast using constrictive material due to gender transformation or identity, and this may also cause health problems.
- Breast Flattening can happen anywhere in the world, the map below represents the countries where research has been carried out. Just because a country is not highlighted, doesn’t mean it does not happen, it means there is no research in that area. <https://nationalfgmcentre.org.uk/wp-content/uploads/2018/04/About-Breast-Flattening-Leaflet-.pdf>

What the health consequences of breast flattening or breast ironing?

Due to the type of instruments that may be used, the type of force and the lack of aftercare, significant health and developmental issue may occur, such as:

- Abscesses.
- Cysts.
- Itching.
- Tissue damage.
- Infection.
- Discharge of milk.
- Dissymmetry of the breasts.
- Severe fever.
- Even the complete disappearance of one or both breasts.

There may also be an impact on the child’s social and psychological well-being.

Although there is no specific law within the UK around breast flattening or breast ironing, it is a form of physical abuse and if professionals are concerned a child may be at risk of, or suffering significant harm, they must refer to their local safeguarding procedures.

Signs and symptoms that a girl could be at risk of breast flattening or breast ironing, may include:

- A girl is embarrassed about her body.
- A girl is born to a woman who has undergone breast flattening.

- A girl has an older sibling or cousin who has undergone breast flattening.
- If there are references to breast flattening in conversation, for example a girl may tell other children about it.
- A girl may request help from a teacher or another adult if she is aware or suspects that she is at immediate risk.
- A girl from an affected community is withdrawn from PSHE and / or Relationship, Sex & Health Education, as her parents wish to keep her uninformed about her rights.
- One or both parents, or elder family members, consider breast flattening integral to their cultural identity.
- The family indicate that there are strong levels of influence held by elders who are involved in bringing up female children and support breast flattening.
- A girl / family has limited level of integration within UK community.

As well as the above, we should be mindful that:

- A girl may disclose to a teacher, social worker, GP or another medical professional.
- Some girls may ask for help, perhaps talk about pain or discomfort in their chest area but may not be explicit about the problem due to embarrassment or fear.
- A girl may display reluctance to undergo medical examination.
- A girl may be fearful of changing for physical activities due to scars showing or bandages being visible.

What to do if you are worried about breast flattening or breast ironing:

If you are concerned that a girl is at risk of breast flattening, a referral must be made to the LACSC.

If you are concerned that the girl is in immediate danger, contact the police by calling 999.

You should also contact the Foreign and Commonwealth Office if the girl has been taken abroad:

- telephone: 020 7008 1500
- from overseas: +44 (0)20 7008 1500

Appendix E: Preventing Radicalisation

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

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** is an action that endangers or causes serious violence to a person / people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

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).

- However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised.
- As with other safeguarding risks, staff should be alert to changes in pupils behaviour, which could indicate that they may be in need of help or protection.

The DSLs should be aware of local procedures for making a Prevent referral.

The Prevent Duty

All schools are subject to a duty under section 26 of the Counter Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

School Leaders must:

- Familiarise themselves with the Prevent duty guidance: for England and Wales.
- Take part in Prevent training and ensure staff have the relevant training.
- Assess local risk of extremism.
- Ensure there are robust IT protocols to filter out extremist materials.
- Ensure school buildings are not being used to give a platform to extremists.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A DSL may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

Understanding and recognising risks and vulnerabilities of radicalisation

Children can be drawn into violence, or they can be exposed to the messages of extremist groups by many means. These may include through the influence of family members or friends and / or

direct contact with extremist groups and organisations or, increasingly, through the internet. This can put a child or young person at risk of being drawn into criminal activity and has the potential to cause significant harm.

Staff should use their judgement in identifying pupils who might be at risk of radicalisation and act proportionately which may include a DSL making a Prevent and / or Channel referral.

Possible indicators include:

- Use of inappropriate language.
- Possession of violent extremist literature.
- Behavioural changes.
- Advocating violent actions including:
 - Association with known extremists.
 - Seeking to recruit others to an extremist ideology.

If concerns exist regarding radicalisation or extremism:

- Inform / discuss with a DSL.
- Record incident / evidence on CPOMS.
- Report to Northumbria Police Call 0800 011 3764 or email prevent@newcastle.gov.uk (usually reported by a DSL or DDSL).
- Inform / seek guidance the Prevent Coordinator – Newcastle on 07710845366 or by email joe.hogan@newcastle.gov.uk or prevent@newcastle.gov.uk

Information and the current contact name and telephone numbers at the following link:

- <https://www.servicestoschools.org.uk/Page/15381>

The Prevent referral form at the following link:

- https://newcastle-central.oncreate.app/w/webpage/request?service=prevent_referral_form

Further information is available at the following link:

- <https://www.newcastle.gov.uk/services/communities-and-neighbourhoods/prevent-newcastle>

Appendix F: Private Fostering (PF)

Many people find themselves looking after someone else's child without realising that they may be involved in Private Fostering (PF). A PF arrangement is one that is made privately, that is to say without the involvement of a Local Authority (LA), for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or immediate relative.

If the arrangement is to last, or has lasted, for 28 days or more it is private fostering. The Children Act 1989 defines a relative as a grandparent, brother, sister, uncle or aunt (whether of full blood or half blood or by marriage or civil partnership), or a stepparent. People become involved in PF for all kinds of reasons. Examples of PF include:

- Children who need alternative care because of parental illness.
- Children whose parents cannot care for them because their work or study involves long or antisocial hours.
- Children sent from abroad to stay with another family, usually to improve their educational opportunities.
- Unaccompanied asylum-seeking and refugee children.
- Teenagers who stay with friends (or other non-relatives) because they have fallen out with their parents.
- Children staying with families while attending a school away from their home area.

There is a mandatory duty on the school to inform LACSC of a known PF Arrangement. LACSC has a duty to check that the young person is being properly cared for and that the arrangement is satisfactory. Further information can be found at the following link:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/274414/Children_Act_1989_private_fostering.pdf

Appendix G: Children Missing from Education

All staff should be aware that if pupils go missing, particularly repeatedly, this can be a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include CSE or CCE including involvement in CL. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, HBA.

Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a pupils going missing in future. Staff should be aware of the school's **Registration & Attendance Policy**. Further information can be found in 'Children Missing Education' statutory guidance for local authorities, which can be found at this link: [https://assets.publishing.service.gov.uk/media/66bf57a4dcb0757928e5bd39/Children_missing_education_guidance - August 2024.pdf](https://assets.publishing.service.gov.uk/media/66bf57a4dcb0757928e5bd39/Children_missing_education_guidance_-_August_2024.pdf)

Appendix H: Sexual Violence and Sexual Harassment Between Pupils in School

Sexual violence and sexual harassment can occur between two (or more) pupils of any age, or sex, from primary to secondary stage. It can occur through a group of children sexually assaulting or sexually harassing a single pupil or group of pupils. It can also occur online. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This may, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) also attends the school. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, pupils with SEND and LGBTQ+ pupils are at greater risk.

All staff have been made aware of the importance of:

- Challenging inappropriate behaviours.
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- Not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”.
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts.
- Dismissing or tolerating such behaviours (this risks normalising them).

Sexualised behaviour

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline and both inside and outside of school.

Sexual harassment is likely to violate a child’s dignity, and / or make them feel intimidated, degraded or humiliated and / or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names.
- Sexual “jokes” or taunting.
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature.
- Online sexual harassment (this may be standalone, or part of a wider pattern of sexual harassment and / or sexual violence).
- Consensual and non-consensual sharing of nudes and semi-nude images and / or videos.
- Sharing of unwanted explicit content.
- Upskirting (which is a criminal offence).
- Sexualised online bullying.

- Unwanted sexual comments and messages, including, on social media.
- Sexual exploitation (including coercion and threats).

Upskirting

The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a persons' clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim.

Appendix I: Modern Slavery and Trafficking

Modern Slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism (NRM) is available in the Modern Slavery Statutory Guidance 'how to identify and support victims', which can be found at this link: <https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims>

Human Trafficking is 'the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, of the abuse of power, or of a position of vulnerability, or of the giving or receiving of payments, or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs'.

Child Trafficking ("Child" shall mean any person under eighteen years of age) is any child transported for exploitative reasons is considered to be a trafficking victim, whether or not they have been forced or deceived. This is partly because it is not considered possible for children to give informed consent. Even when a child understands what has happened, they may still appear to submit willingly to what they believe to be the will of their parents or accompanying adults. It is important that these children are protected too.

Children are trafficked for many reasons, including sexual exploitation, domestic servitude, labour, benefit fraud and involvement in criminal activity such as pickpocketing, theft and working in cannabis farms. There are a number of cases of minors being exploited in the sex industry. Although there is no evidence of other forms of exploitation such as 'organ donation or 'harvesting', all agencies should remain vigilant. Children may be trafficked from other countries for a variety of reasons. There are a number of factors in the country of origin which might make children vulnerable to being trafficked. The factors listed below are by no means a comprehensive list:

- Poverty.
- Lack of education.
- Discrimination.
- Cultural attitudes.
- Grooming.
- Dysfunctional families.
- Political conflict and economic transition.
- Inadequate local laws and regulations.

Potential indicators that a child may have been trafficked, are that the child:

- Receives unexplained / unidentified phone calls whilst in placement / temporary accommodation.
- Shows signs of physical or sexual abuse, and / or has contracted a sexually transmitted infection or has an unwanted pregnancy.
- Has a history with missing links and unexplained moves.

- Has gone missing from LACSC.
- Is required to earn a minimum amount of money every day.
- Works in various locations.
- Has limited freedom of movement.
- Appears to be missing for periods.
- Is known to beg for money.
- Performs excessive housework chores and rarely leaves the residence.
- Is being cared for by adults who are not their parents and the quality of the relationship between the child and their adult carers is not good; is one among a number of unrelated children found at one address.
- Has not been registered with or attended a GP practice.
- Has not been enrolled in school.
- Has to pay off an exorbitant debt, e.g. for travel costs, before having control over own earnings, is permanently deprived of a large part of their earnings by another person.
- Is excessively afraid of being deported.

Further information can be found at the below link:

www.gov.uk/government/publications/safeguarding-children-who-may-have-been-traffickedpractice-guidance

Appendix J: Domestic Abuse (DA)

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of DA and recognises the impact of DA on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members or an institutional and community setting by those known to them or, more rarely, by others. The cross-government definition of DA is:

- Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

The abuse can encompass, but is not limited to:

- Psychological.
- Physical.
- Sexual.
- Financial.
- Emotional.

All children can witness and be adversely affected by DA in the context of their home life where DA occurs between family members. DA can impact on children through seeing, hearing or experiencing. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Children can also experience DA within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'Teenage Relationship Abuse' (TRA).

Depending on the age of the child, this may not be recognised in law under the statutory definition of 'DA' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures will be followed and both young victims and young perpetrators will be offered support.

Signs, indicators and effects:

It is often difficult to tell if DA is happening because it takes place in the family home and abusers can act very differently when other people are around. Children who witness DA may show signs of:

- Aggression and bullying.
- Anti-social behaviour.
- Depression, anxiety or have suicidal thoughts.
- Attention seeking.
- Bed wetting, nightmares or insomnia.
- Drug and alcohol misuse.
- Constant or regular sickness, such as colds and headaches.
- Eating disorders.
- Not doing as well in school (due to difficulties at home or disruption of moving to, as well as from, refuges).
- Withdrawal.

Other signs and symptoms may include:

- Sudden change of behaviour.
- Clingy.

- Soiling clothes.
- Risk taking behaviours.
- Missing school.
- Changes in eating habits.
- Obsessive behaviour.
- Self-harm

For more information please see (source): www.nspcc.org.uk.

Appendix K: Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a pupils welfare. A DSL should be aware of contact details and referral routes into the Local Housing Authority so they can raise / progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, DA and anti-social behaviour, as well as the family being asked to leave a property.

Types of homelessness could include:

- Living in temporary or emergency accommodation (such as bed and breakfasts and hostels etc.).
- Hidden homelessness (staying with friends or family on a temporary basis or living in overcrowded conditions).
- Couch / sofa surfing, moving from one place to another.

Impact of homelessness may include:

- Practical issues include loss of possessions required for school e.g. books, uniform etc.
- The child may be unkempt due to lack of laundry services.
- Physically exhausted due to sleeping arrangements.
- Emotionally exhausted due to increased stress.
- Signs of severe emotional trauma leading to emotional stress, anxiety.
- Changes in behaviour and / or problematic behaviour.
- A child may become withdrawn or aggressive.
- If placed out of area they may arrive late or miss school due to transport / financial difficulties.
- The child's ability to maintain relationships may be affected.
- A child may 'stand out' more to peers, leading to feelings of alienation and self-consciousness.
- Attainment levels and ability to learn.

In most cases school staff will be considering homelessness in the context of pupils who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents / carers. For example, this might be through exclusion from the family home and will require a different level of intervention and support. LACSC will be the lead agency for these pupils and a DSL should ensure appropriate referrals are made based on the pupils circumstances.

Appendix L: Online Safety

It is essential that our pupils are safeguarded from potentially harmful and inappropriate material or behaviours online. We will adopt a whole school approach to online safety which will empower, protect, and educate our pupils and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.

- We will ensure online safety is reflected as required in all relevant policies. Online safety is considered as a running and interrelated theme when devising and implementing our policies and procedures, when planning our curriculum, when considering staff training, and when defining the role and responsibilities of a DSL, and parental / carer engagement.

The school identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful content. For example, pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism.
- **Contact:** being subjected to harmful online interaction with other users. For example, child on child pressure, commercial advertising and adults posing as children with the intention to groom or exploit children for sexual, criminal, financial or other purposes.
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images (e.g. consensual and nonconsensual sharing of nudes and semi-nudes and / or pornography), sharing other explicit images and online bullying.
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and / or financial scams.

Policies and Procedures

- The Head Teacher has overall responsibility for online safety within the school but will liaise with other members of staff, for example internal and external IT support staff, Teachers, Specialist / Support Assistants etc. with regards to online safety, training etc. as necessary.
- A DSL will respond to online safety concerns reported in line with this **Safeguarding Policy** and other associated policies, including our **Anti-bullying (Pupils) and Behaviour Management Policies**.
- Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.
- Internal sanctions and / or support will be implemented as appropriate.

We use a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet and email systems. All school owned devices and systems will be used in accordance with our procedures and with appropriate safety and security measures in place.

- We recognise the specific risks that can be posed by mobile and smart technology, including mobile / smart telephones, cameras and wearable technology. In accordance with KCSiE the school has appropriate mobile and smart technology, image use and an Acceptable use of Charity Internet, ICT Systems and Equipment Agreement in place, which are shared and understood by all members of the community.

Appropriate Filtering and Monitoring

The Charity will do all we reasonably can to limit our pupils exposure to online risks through school provided IT systems and will ensure that appropriate filtering and monitoring systems are in place.

General / Additional Information:

- If pupils or staff discover unsuitable sites or material, they are required to report this to a DSL and ensure the IT Support Assistant is aware of the sites / material accessed.
- All users will be informed that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights, and privacy legislation.
- Filtering breaches or concerns identified through our monitoring approaches will be recorded and reported to a DSL who will respond as appropriate.
- Any access to material believed to be illegal will be reported immediately to the appropriate agencies, such as the Internet Watch Foundation and the Police (when implementing appropriate filtering and monitoring, we will ensure that “over blocking” does not lead to unreasonable restrictions as to what pupils can be taught with regards to online teaching and safeguarding).
- We acknowledge that whilst filtering and monitoring is an important part of our online safety responsibilities, it is only one part of our approach to online safety.
- Pupils will use appropriate search tools, apps and online resources.
- Pupils will be directed to use age-appropriate online resources and tools by staff, and their internet use will be supervised by staff accordingly.

Information Security and Access Management

- School is responsible for ensuring an appropriate level of security protection procedures are in place, in order to safeguard our systems as well as staff and learners.
- We will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

Staff Training

- Staff receive appropriate training.

Educating Children

We will ensure a comprehensive whole school curriculum response is in place to enable all pupils to learn about, and manage, online risks effectively as part of providing a broad and balanced curriculum.