



Child protection and safeguarding policy

**(including safer recruitment,
allegations against staff and low-level
concerns)**

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Important contacts

ROLE	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Julie Cox	jcox@lotustrust.org.uk School hours: 01842 773673 Out of hours: 07779220757

Deputy/ Alternate DSL	Sandra Govender	ceo@lotustrust.org.uk 0786053 7119
CEO	Sandra Govender	ceo@lotustrust.org.uk
Local authority designated officer (LADO)	Suffolk Norfolk	LADO@suffolk.gov.uk / 0300 123 2044 LADO@norfolk.gov.uk / 0344 800 8020
Duty Desk triage (LADO)	Norfolk	01603 307797
Chair of Trustees	Karen Hobley	khobley@lotustrust.org.uk
Trustee responsible for safeguarding	Lucy Evans	levans@lotustrust.org.uk
Other relevant organisations	Channel helpline	020 7340 7264
Other relevant organisations	Children's Advice and Duty Service (CADS)	03448008021
Other relevant organisations	Police	999/101
After hours contact To be used only in cases of emergency	CEO: Sandra Govender	07860537119

Important: All contact details should be reviewed and updated at least annually. If you need to contact the DSL or deputies outside of school hours in an emergency, use the out-of-hours contact numbers listed above. In a life-threatening emergency, always call 999.

1. Aims

The school aims to ensure that:

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

2. Legislation and statutory guidance

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

This policy is also based on the following legislation:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- o [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children

Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

- o [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- o [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children

Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children

- o [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- o [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- o [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our trustees and CEO should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- o The Data (Use and Access) Act 2025, which forms part of data protection legislation alongside the Data Protection Act 2018 and UK GDPR, and sets out provisions for the use and sharing of data for safeguarding purposes
- o [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

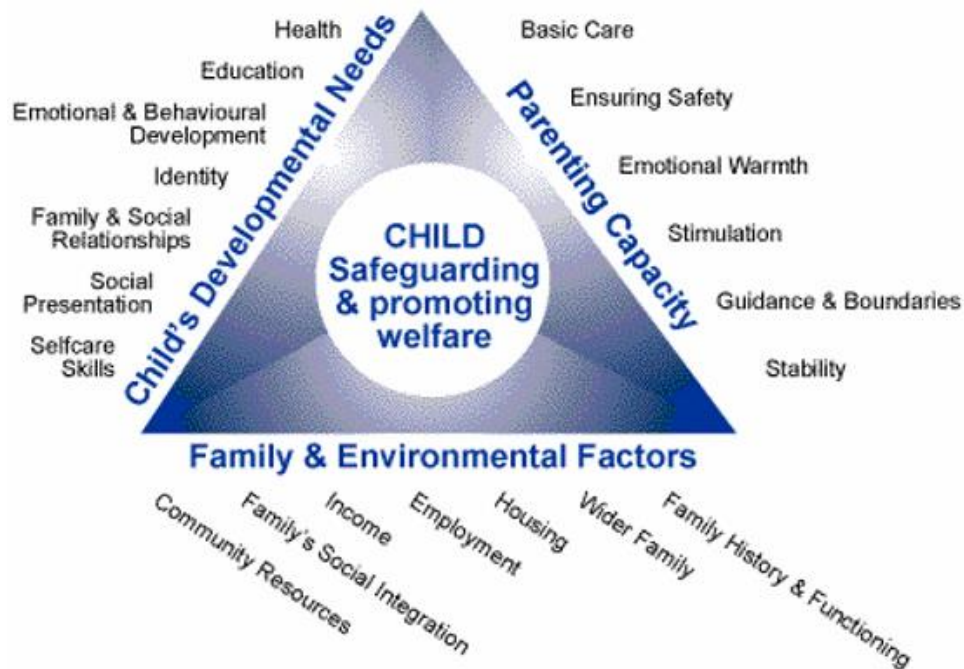
The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children.

The school is a member of the Norfolk Safeguarding Children's Partnership.

The relationship between core agencies in safeguarding vulnerable children is crucial
[6](#) sets out the shared duty of everyone who works with children having a responsibility to keep them safe.

No single practitioner can have a full picture of a child's needs and circumstances and, if children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action (taken from WT2018 p10). This means we need to be working together effectively.

Framework to Support Multi-agency Working Together in Norfolk



3. Definitions

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

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

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

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

Making or sharing of nudes or semi-nudes refers to when children create, possess, or share nude or semi-nude images, videos or live streams. This includes images that are:

- Digitally altered using technology
- Wholly generated by artificial intelligence (e.g., deepfakes)
- Shared consensually or non-consensually

From September 2026, KCSIE uses this updated terminology to encompass all incidents where children make or share such images. All incidents involving the making or sharing of nudes or semi-nudes require a safeguarding response, regardless of whether the images appear to be consensual.

Children includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

The local authority (LA)

Integrated care boards (previously known as clinical commissioning groups) for an area within the LA

The chief officer of police for a police area in the LA area

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

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

4. Equality statement

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

We give special consideration to children who:

- Have special educational needs and/or disabilities (SEND) or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence

- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from school to be home educated

5. Roles and responsibilities

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

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

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
 - Healthy and respectful relationships
 - Boundaries and consistency
 - Awareness of stereotyping, prejudice and equality
 - Promoting body confidence and self-esteem
 - Knowledge of how to recognise an abusive relationship (including coercive and controlling behaviour)
 - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
 - Knowledge of what constitutes sexual harassment and sexual violence and why they're always unacceptable

5.1 All staff

All staff will:

- Read and understand **Part 1 (in its entirety) and Annex B** of the Department for Education's statutory safeguarding guidance, Keeping children safe in education 2026, and review this guidance at least annually. **Important change from September 2026:** All staff members

(including those not working directly with children) must now read Part 1 in full. The previous condensed summary (formerly Annex A) has been removed.

- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL), the behaviour policy, e-Safety policy including the roles and responsibilities in relation to filtering and monitoring, and the safeguarding response to children who go missing from education
- The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children
- What to look for to identify children who need help or protection

Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Mrs Julie Cox, Deputy Headteacher. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes

online safety and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

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

When the DSL is absent, the deputy DSL Mrs Sandra Govender, CEO – will act as cover.

Sandra Govender is the DSL to contact during out-of-hours and/or out-of-term activities.

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school

The DSL will also:

- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- Lead or support the **annual review of filtering and monitoring systems**, working with the senior leadership team member responsible for these systems and IT support staff. This review must assess the effectiveness of current systems and whether any adjustments are needed.

5.3 The Trust board

The trust board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Deputy Headteacher to account for its implementation

- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a senior board level (or equivalent) lead to monitor the effectiveness of this policy in conjunction with the full trust board. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the school has appropriate filtering and monitoring systems in place and **review their effectiveness at least once every academic year**. This review must be conducted by the Senior Leadership Team member responsible for filtering and monitoring (currently Sandra Govender), supported by the Designated Safeguarding Lead and IT support staff. The review must assess:
 - The effectiveness of current filtering and monitoring systems
 - Whether systems are blocking harmful and inappropriate content without unreasonably impacting teaching and learning
 - Whether systems are meeting the safeguarding needs of the school
 - Any incidents where filtering or monitoring has identified concerns
 - Whether any adjustments to systems are needed
 - The results of this review must be reported to the trust board annually and recorded
 - Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards (see Appendix 5)

The Trust Board will make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate

- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of trustees will act as the 'case manager' in the event that an allegation of abuse is made against the CEO or Deputy Headteacher, where appropriate (see appendix 3).

All trustees will read Keeping Children Safe in Education 2026 in its entirety.

Section 15 of this policy has information on how trustees are supported to fulfil their role.

5.4 The Deputy Headteacher

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

- Ensuring that staff (including temporary staff) and volunteers:
- Are informed of our systems which support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns, discussing or collaborating with the deputy DSLs, as appropriate

6. Confidentiality

Our school's approach to confidentiality and data protection with respect to safeguarding is covered in our Data Protection Policy.

We note that:

Timely information sharing is essential to effective safeguarding

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

Data protection legislation (the Data Protection Act 2018, UK GDPR, and the Data (Use and Access) Act 2025) does not prevent, or limit, the sharing of information for the purposes of keeping children safe

If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information

without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk

Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests

If a victim asks the school not to tell anyone about the sexual violence or sexual harassment, or does not consent to sharing information staff should still lawfully share it if there's another legal basis under

The DSL will have to balance the victim's wishes against their duty to protect the victim and other children

The DSL should consider that:

Parents or carers should normally be informed (unless this would put the victim at greater risk)

The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care

Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

Regarding anonymity, all staff will:

Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system

Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved

Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information

If staff are in any doubt about sharing information, they should speak to the DSL (or deputy DSL)

Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3

7. Recognising abuse and taking action

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

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

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

Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

The following link to the GOV.UK webpage is used for reporting child abuse to our local council:

<https://www.gov.uk/report-child-abuse-to-local-council>

7.2 If a child makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it. If the child is in immediate danger speak to the DSL or Deputy DSL at once before writing up the concern.
- Using the secure CPOMS system, complete a disclosure form (including the date and time of the disclosure). All disclosures will be automatically assigned to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so, you must record this using CPOMS. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

Not feel ready, or know how to tell someone that they are being abused, exploited or neglected

Not recognise their experiences as harmful

Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

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

All concerns should be recorded on CPOMs or if you do not have access, a school safeguarding form.

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

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

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

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

Any qualified teacher (in a regulated profession) who either:

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

KNOWN cases must immediately be reported to the police, personally by this member of staff. This is a mandatory statutory duty, and qualified teachers will face disciplinary sanctions for failing to meet it.

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

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

The duty for all staff including qualified teachers mentioned above does not apply in cases where a pupil is suspected to be *at risk* of FGM or FGM is suspected to have been carried out. Staff should not examine pupils.

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

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

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

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0800 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

All actions must be recorded on the school's CPOMS system.

Early help assessment

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

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

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Referral

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

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible and record what action you have taken on a school safeguarding form.

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

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

7.5 If you have concerns about extremism

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

If in exceptional circumstances the DSL or deputy DSL's are not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

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

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

- Think someone is in immediate danger

- Think someone may be planning to travel to join an extremist group

- See or hear something that may be terrorist-related

7.6 If you have a concern about mental health

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

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

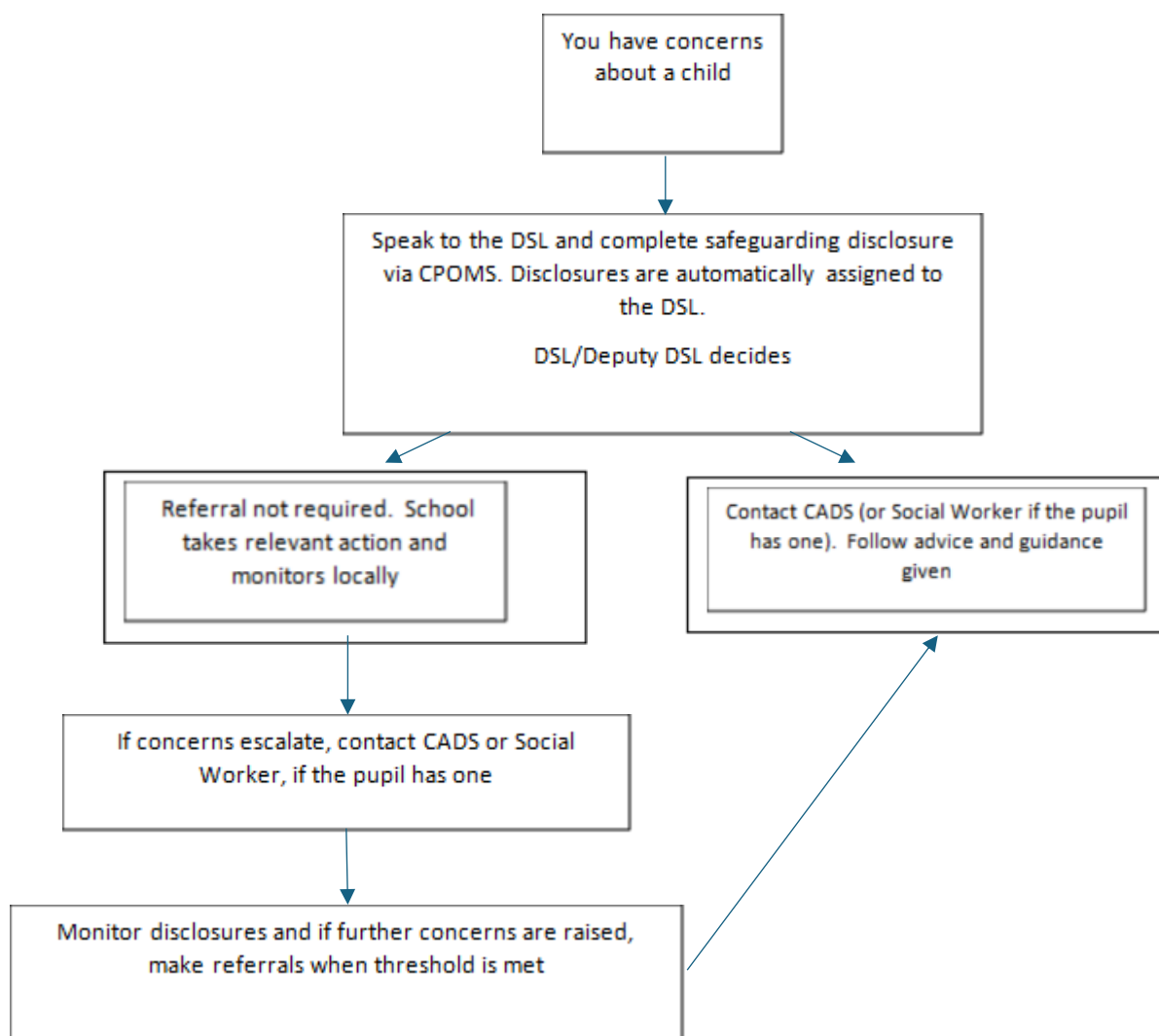
If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

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

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

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

(Note – if the DSL or Deputy DSL's are unavailable, this should not delay action. See section 7.4 for what to do.)



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

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the Deputy Headteacher as soon as possible. If the concerns/allegations are about the Deputy Headteacher, speak to the Chair of Trust Board. The Deputy Headteacher / Chair of Trust Board will then follow the procedures set out in appendix 3, if appropriate.

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

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

7.8 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school’s behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 4 for more information about child-on-child abuse.

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

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation and tell the DSL, but do not investigate it

The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence

The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)

The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Creating a supportive environment in school and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images. This includes challenging **misogyny** (prejudice against women and girls) and **misandry** (prejudice against men and boys)
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment

Ensure staff are trained to understand:

How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports

That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”

That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:

Children can show signs or act in ways they hope adults will notice and react to

A friend may make a report

A member of staff may overhear a conversation

A child's behaviour might indicate that something is wrong

That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation

That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it

That they should speak to the DSL if they have any concerns

That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this

There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

7.9 Making or sharing of nudes or semi-nudes

Important terminology update

From September 2026, KCSIE uses the term '**making or sharing of nudes or semi-nudes**' to encompass all incidents where children create, possess, or share such images. This includes:

- Images or videos that are digitally altered
- Images wholly generated by artificial intelligence (AI), including deepfakes
- Both consensual and non-consensual sharing

All such incidents require a safeguarding response. Staff must be aware that AI technology can now be used to create realistic nude or semi-nude images of children without their knowledge or consent.

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual making or sharing of nude or semi-nude images/videos, you must report it to the DSL immediately.

You must **not**:

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

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

Initial review meeting

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

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)
- **Whether the images were created using AI technology** and if so, whether the child depicted consented to or was aware of the creation of such images

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult

- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the making or sharing of nudes or semi-nudes (for example, the young person is presenting as suicidal or self-harming)
- **The images were created using AI technology without the knowledge or consent of the child depicted**

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

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

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

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through dialling 101.

Recording incidents

All incidents of making or sharing of nudes or semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 15 of this policy also apply to recording these incidents.

Records will specifically note:

- Whether AI technology was involved in creating the images
- The platform or method used to create or share the images

- The extent of distribution
- Actions taken to remove images from circulation

Curriculum coverage

Pupils are taught about the issues surrounding the making or sharing of nudes or semi-nudes as part of our pupil briefing, The World of Work, The Society I Live In, Assemblies and computing programmes.

Teaching covers the following:

- What it is, including how AI can be used to create fake images
- How it is most likely to be encountered
- The consequences of creating, requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality, including that creating or sharing nude images of anyone under 18 is illegal
- The risk of damage to people's feelings and reputation
- How AI-generated images can be used to harm, bully or exploit others
- The permanence of digital content and how images can resurface years later

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images
- Discovering that fake images have been created of them or others
- How to report concerns about AI-generated images

This policy on the making or sharing of nudes or semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

7.10 Reporting systems for our pupils

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

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

To achieve this, we will:

Put systems in place for pupils to confidently report abuse to any member of staff they wish to

Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils

Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

8. Online safety and the use of mobile technology

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

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and trustees
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

Mobile phone-free environment

From September 2026, KCSIE 2026 introduces the expectation that schools should be 'mobile phone-free environments' to support pupils' wellbeing and reduce distractions from learning.

Our approach to pupil mobile phones:

- Pupils are **not permitted to use mobile phones** during the school day, including lessons, breaktimes, and lunchtimes
- Pupils must hand in their mobile phones to staff at the start of the school day. Phones will be stored securely and returned at the end of the day
- Pupils who bring phones to school must ensure they are switched off before handing them in
- Staff will confiscate phones if pupils breach these rules, in line with our behaviour policy
- Repeated breaches will result in escalating consequences as outlined in our behaviour policy
- Parents/carers will be informed of our mobile phone policy and the safeguarding reasons for it

Rationale:

This approach:

- Reduces distractions and supports pupils' ability to focus on learning
- Minimises opportunities for cyberbullying during the school day
- Reduces risks associated with the making or sharing of nudes or semi-nudes
- Protects pupils from harmful online content during school hours
- Supports pupils' mental health and wellbeing
- Promotes face-to-face social interaction

Staff mobile phones:

- Staff are allowed to bring their personal phones to school for their own use which must be locked away during work hours
- Staff will **not** take pictures or recordings of pupils on their personal phones or cameras
- Staff must not use their personal phones to contact pupils or parents/carers (school devices should be used for this purpose)
- Approved mobile phones and tablets owned by the school can be used to take pictures and recordings of pupil activities

The 4 key categories of risk

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

Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism

Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above, we will:

Educate pupils about online safety as part of our curriculum. For example:

The safe use of social media, the internet and technology

Keeping personal information private

How to recognise unacceptable behaviour online

How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim

Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year

Educate parents/carers about online safety via our website, communications sent directly to them and during parents' consultation. We will also share clear procedures with them so they know how to raise concerns about online safety

Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present

Staff will not take pictures or recordings of pupils on their personal phones or cameras

Make all pupils, parents/carers, staff, volunteers and trustees aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology

Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones

Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)

Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.

Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively

Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

8.1 Generative Artificial Intelligence (AI)

Understanding the risks

Generative AI tools (such as ChatGPT, Google Bard, Microsoft Copilot, image generators like DALL-E and Midjourney, and video creation tools) are now widespread and easily accessible. While AI has many beneficial uses in education, it also presents significant safeguarding risks that all staff must understand.

Safeguarding risks

AI presents risks across all four categories of online safety:

Content risks:

- AI can generate harmful, inappropriate or illegal content, including violent or sexual material
- AI can be used to create convincing fake content (deepfakes), including fake nude or semi-nude images of real children
- AI chatbots may provide inaccurate, harmful or age-inappropriate advice or information
- AI may expose children to content that promotes self-harm, eating disorders, or extremist views
- AI can be used to generate content that appears to come from trusted sources but is actually false

Contact risks:

- AI tools may facilitate grooming or exploitation by adults posing as children
- AI can be used to impersonate others, including trusted adults or peers
- Children may form inappropriate emotional attachments to AI chatbots
- AI can be used to manipulate children into sharing personal information
- Predators may use AI to create fake profiles or personas to contact children

Conduct risks:

- AI can be used to create fake nude or semi-nude images of children without their knowledge or consent (see Section 7.9)
- AI can be used for sophisticated cyberbullying, including creating fake embarrassing content

- AI can be used to cheat or plagiarise in schoolwork
- Children may share personal or sensitive information with AI tools without understanding the implications
- AI can be used to manipulate or deceive others
- AI-generated content can be used to spread rumours or false information about others

Commerce risks:

- Some AI tools collect and monetise user data, including children's data
- Children may be exposed to inappropriate advertising or commercial exploitation
- AI may facilitate financial scams targeting children or their families
- Children may inadvertently agree to terms of service that compromise their privacy

Specific concern: AI-generated nude or semi-nude images

A particularly serious risk is the use of AI to create fake nude or semi-nude images of real children. This involves:

- Taking a clothed image of a child (often from social media)
- Using AI to generate a nude or semi-nude version of that image
- The child depicted may have no knowledge that such images exist

This is extremely harmful and is treated as a serious safeguarding concern. Such images:

- Are illegal to create, possess or share
- Cause significant distress and harm to the child depicted
- Can be used for blackmail, exploitation or bullying
- Can spread rapidly online
- Are very difficult to remove once shared

Any incident involving AI-generated nude or semi-nude images will be treated in line with Section 7.9 of this policy and will be reported to police.

Our response

The Lotus Academy Trust will:

Education and awareness:

- Educate pupils about the risks and benefits of AI as part of our computing and RSHE curriculum as well as any other opportunities to include such learning, including:
 - How AI works and its limitations
 - The risks of sharing personal information with AI tools
 - How AI can be used to create fake content, including deepfakes
 - The legal and ethical implications of using AI to create harmful content
 - How to critically evaluate AI-generated content
 - How to report concerns about AI misuse
- Ensure staff are aware of AI risks through regular training and updates, including:
 - How to identify AI-generated content

- Signs that a child may be experiencing harm related to AI
 - How to respond to incidents involving AI
 - How to use AI tools safely and appropriately in teaching
- Provide information and guidance to parents/carers about AI risks and how to keep their children safe

Risk assessment and management:

- Carry out a **data protection impact assessment (DPIA)** before introducing any new AI tool for use by staff or pupils, considering:
 - Data protection implications (see Section 6)
 - Age-appropriateness and terms of service
 - Content filtering and monitoring capabilities
 - Privacy settings and data collection practices
 - Security measures
 - How the tool will be supervised and monitored
- Maintain a register of approved AI tools for use in school
- Monitor the use of AI tools on school devices and networks through our filtering and monitoring systems
- Regularly review and update our approach to AI as technology develops

Policies and procedures:

- Treat any use of AI to access harmful content, create harmful content, or bully pupils in line with this policy and our Anti-bullying and Behaviour policies
- Include AI safety in our online safety education for pupils, parents/carers and staff
- Keep up to date with emerging AI technologies and associated risks through regular review of guidance from the UK Safer Internet Centre, NSPCC, and other relevant organisations

Staff responsibilities

All staff must:

- **Never** use AI tools to create, share or store images of pupils without explicit permission from the Deputy Headteacher and appropriate safeguarding considerations
- Carry out risk assessments before using AI tools with pupils
- Ensure pupils are supervised when using AI tools
- Report any concerns about AI misuse to the DSL immediately
- Be aware that AI-generated content may not be accurate, appropriate or safe
- Model safe and responsible use of AI
- Challenge any inappropriate use of AI by pupils
- Be alert to signs that a child may be experiencing harm related to AI

Staff must not:

- Use AI to generate content that could be harmful, inappropriate or misleading
- Share pupils' personal information with AI tools without appropriate safeguards
- Allow unsupervised use of AI tools by pupils
- Assume that AI-generated content is accurate or appropriate

Reporting concerns

Any concerns about AI misuse should be reported to the DSL immediately, including:

- Suspected AI-generated fake images of pupils (including nudes or semi-nudes)
- Pupils using AI to access inappropriate content
- Pupils being contacted or groomed via AI tools
- Pupils using AI to bully, harass or harm others
- Pupils sharing personal information with AI tools
- Any other AI-related safeguarding concerns

The DSL will assess the concern and take appropriate action, which may include:

- Speaking to the child/children involved
- Contacting parents/carers
- Making a referral to children's social care and/or police
- Taking action to remove harmful content
- Providing support to affected pupils
- Reviewing and updating school policies and procedures

Responding to AI-generated nude or semi-nude images

If staff become aware that AI has been used to create nude or semi-nude images of a pupil:

1. **Do not view, share or forward the images**
2. **Report immediately to the DSL**
3. **Follow the procedures in Section 7.9** of this policy
4. **The DSL will:**
 - a. Make an immediate referral to police (this is a criminal offence)
 - b. Contact parents/carers (unless this would put the child at greater risk)
 - c. Provide support to the affected child
 - d. Take steps to have images removed from circulation where possible
 - e. Consider whether other children may be affected
 - f. Review security of pupils' images online

9. Notifying parents or carers

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

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

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

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

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

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

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

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

All of our pupils have SEND and certain health conditions such as neurodiversity, so they can face additional safeguarding challenges. Research shows that children with SEND are three times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- Increased vulnerability to exploitation, including online exploitation
- Dependency on multiple carers, which can increase risk
- Intimate care needs, which require careful safeguarding

Our response:

We will:

- Be particularly alert to signs of abuse in pupils with SEND
- Not assume that changes in behaviour or injuries are related to the child's disability without further exploration
- Ensure pupils with SEND have access to appropriate support to communicate concerns
- Provide staff with training on safeguarding pupils with SEND
- Work closely with parents/carers and other professionals
- Ensure our safeguarding procedures are accessible to all pupils
- Consider reasonable adjustments to support pupils with SEND to report concerns

Young carers

We recognise that children who are young carers may face additional safeguarding risks. Young carers may:

- Miss school or education to care for family members
- Experience emotional stress and mental health difficulties
- Have limited time for social activities and friendships
- Be at risk of inappropriate caring responsibilities
- Experience poverty or financial hardship
- Be isolated from peers
- Have their own needs overlooked

Indicators that a child may be a young carer include:

- Poor attendance or punctuality
- Tiredness or difficulty concentrating
- Missing homework or incomplete work
- Limited social interaction with peers
- Taking on adult responsibilities
- Anxiety about home situation
- Reluctance to participate in after-school activities

Our response:

- Staff will be alert to signs that a child may be a young carer
- We will work sensitively with families to ensure appropriate support is in place
- We will make referrals to local young carers' services where appropriate
- The DSL will ensure young carers are identified and supported
- We will make reasonable adjustments to support young carers' education
- We will not make assumptions about what caring responsibilities are appropriate for a child

Children with medical conditions

We recognise that children with specific medical conditions may face additional safeguarding considerations. This includes:

- Children who require regular medication or medical interventions
- Children with life-limiting or life-threatening conditions
- Children whose medical conditions may affect their ability to communicate concerns
- Children who are dependent on adults for intimate care
- Children whose medical needs may make them more vulnerable to abuse

Our response:

- We maintain up-to-date medical information for all pupils
- Staff are trained to recognise signs of medical emergencies
- We work closely with parents/carers and healthcare professionals
- Individual healthcare plans are in place where needed, which include safeguarding considerations

- We consider safeguarding implications of medical needs, including who has access to the child during medical care
- We ensure that medical care is provided in a way that protects the child's dignity and safety

11. Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

Responding to unauthorised absence or missing education where there are known safeguarding risks
The provision of pastoral and/or academic support

12. Looked-after and previously looked-after children

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

Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements

The DSL has details of children's social workers and relevant virtual school heads

We have appointed an appropriately trained teacher, Mrs Sandra Govender CEO, to take the lead on promoting the educational achievement of looked-after and previously looked-after children.

As part of their role, they will:

Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to

Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children

13. Pupils who are lesbian, gay, bisexual or gender questioning

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. See our behaviour policy for more detail on how we prevent bullying based on gender or sexuality.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

13A. Facilities designated for biological sex and social transition

Introduction

From September 2026, KCSIE 2026 introduces mandatory requirements regarding the use of facilities designated for a specific biological sex and provides detailed guidance on supporting children who are questioning their gender identity.

These requirements are designed to:

- Protect the privacy and dignity of all pupils
- Maintain safe spaces for all pupils
- Balance the needs of all pupils in our school community
- Comply with legal requirements under the Equality Act 2010

Facilities for biological sex

Legal requirement:

From September 2026, schools must prohibit children from entering toilets, changing rooms, and boarding/residential accommodation designated for the opposite biological sex. **No exceptions are permitted**, even when supporting a child's social transition.

Our policy:

At The Damara School, we will:

- **Prohibit pupils from using toilets designated for the opposite biological sex.** This means:
 - Pupils who are biologically male must use male toilets or single-occupancy facilities
 - Pupils who are biologically female must use female toilets or single-occupancy facilities
 - This applies to all pupils, regardless of gender identity
- **Prohibit pupils from using changing rooms designated for the opposite biological sex.** This means:
 - Pupils who are biologically male must use male changing rooms or single-occupancy facilities
 - Pupils who are biologically female must use female changing rooms or single-occupancy facilities
 - This applies during PE lessons, swimming, and any other activities requiring changing
- **Apply the same restriction for participation in PE classes or sports designated for a specific biological sex.** This means:
 - We can legally separate pupils into sports based on biological sex for reasons of safety and fairness
 - Decisions will be made on a case-by-case basis considering the nature of the sport, safety, fairness, and the age and development of pupils
 - We will consult with parents/carers where appropriate
- **Ensure all records accurately record a pupil's biological sex** wherever sex is recorded in school systems and documents. This is a legal requirement.

Alternative arrangements:

Where appropriate, we will provide alternative arrangements such as:

- **Single-occupancy facilities:** We have 1 single-occupancy accessible toilet that can be used by any pupil who prefers privacy
- **Private changing arrangements:** We can arrange for pupils to use private changing areas or change at different times
- **Adjusted timetables:** Where necessary, we can adjust timetables to allow private use of facilities
- **Other reasonable adjustments:** We will consider other adjustments that do not compromise the restrictions above

These alternative arrangements are available to **any pupil** who would benefit from them, not only those questioning their gender identity.

Important notes:

- These restrictions are **mandatory** and apply to all pupils
- Staff must not make exceptions to these rules
- The restrictions apply regardless of a pupil's gender identity or any social transition
- The restrictions are in place to protect the privacy, dignity and safety of all pupils

Single-sex sports

We can legally separate pupils into sports based on biological sex for reasons of safety and fairness, without violating non-discrimination laws.

Our approach:

Decisions about participation in single-sex sports will be made on a case-by-case basis, considering:

- The nature of the sport (contact vs non-contact, competitive vs non-competitive)
- Safety considerations for all participants
- Fairness considerations
- The age and stage of development of the pupils involved
- Any relevant guidance from sports governing bodies
- The individual circumstances of the pupil

These decisions will be made in consultation with:

- The pupil
- Parents/carers (where appropriate)
- The DSL
- PE staff
- External experts if needed

All decisions will be documented with clear rationale.

Social transition

Understanding social transition:

Social transition refers to the process where a child adopts the name, pronouns, and/or gender expression that aligns with their gender identity rather than their biological sex. This might include changes to:

- Name and pronouns
- Uniform
- Presentation and appearance
- Social groups and activities

Important principles:

KCSIE 2026 makes clear that:

- **Schools should not initiate any action regarding a child's social transition**
- Schools should only respond if a child or their parent/carer specifically requests support
- **For primary-aged pupils, particular caution should be exercised.** Support for full social transition in primary schools should be agreed very rarely
- **Schools should work in partnership with parents/carers.** Staff must not adopt any changes relating to social transition without a decision involving the parents/carers, except in exceptionally rare cases where doing so would pose a greater risk to the child's safety
- Social transition is not a neutral act and can have significant effects on a child
- There are still unknowns around the impact of social transition, particularly for pre-pubertal children

Our approach:

At The Damara School, we will:

1. Not initiate discussions about social transition

- We will not suggest or encourage social transition
- We will not assume that a child who does not conform to gender stereotypes wishes to socially transition
- We will create a culture where all pupils feel safe to express themselves without pressure to adopt a particular gender identity

2. Respond carefully if a request is made

If a child or parent/carer requests support with social transition, we will:

- Arrange a meeting with the child, parents/carers, DSL, CEO, and relevant staff
- Take time to understand the request and the child's individual circumstances
- Consider the child's age and stage of development (exercising particular caution for primary-aged pupils)
- Explore whether there are underlying issues that should be addressed (e.g., bullying, mental health concerns, trauma, family difficulties)
- Consider any clinical advice that is available from healthcare professionals
- Assess any wider vulnerabilities, such as:
 - Complex mental health and psychosocial needs
 - Autism spectrum disorder (ASD)
 - Attention deficit hyperactivity disorder (ADHD)
 - History of trauma or abuse
 - Other safeguarding concerns
- Consider the broad range of the child's needs, not just gender identity
- Consider how to address potential risks, including:
 - Risk of bullying or harassment
 - Impact on the child's mental health and wellbeing
 - Impact on other pupils
 - Safeguarding implications (e.g., use of facilities)
- Make decisions on a case-by-case basis
- Document all decisions and the rationale behind them
- Regularly review any support arrangements

3. Work in partnership with parents/carers

- **We will not support social transition without parental involvement** except in exceptionally rare cases where involving parents would pose a greater risk to the child's safety
- If we have concerns about involving parents, we will seek advice from children's social care
- We recognise that parents/carers have the primary role in making decisions about their child's welfare
- We will respect parents'/carers' views and work collaboratively with them

4. Consider carefully before agreeing to any changes

If, after careful consideration, we agree to support aspects of social transition, we will:

- Make clear that this is a cautious, exploratory approach, not a commitment to full transition
- Start with small, reversible changes if appropriate

- Regularly review the impact on the child and adjust our approach as needed
- Ensure all staff are informed and understand their responsibilities
- Consider the impact on other pupils and how to manage this sensitively
- Maintain clear records of all decisions and reviews
- Be prepared to pause or reverse changes if they are not in the child's best interests

5. Maintain safeguarding as the priority

Throughout any discussions or decisions about social transition:

- The child's safety and wellbeing is our primary concern
- We will not compromise safeguarding requirements (e.g., use of facilities designated for biological sex)
- We will be alert to any safeguarding concerns and respond appropriately
- We will seek advice from relevant professionals as needed

What we will not do:

- We will not use a child's preferred name or pronouns without parental knowledge and agreement (except in the rare circumstances described above)
- We will not allow a child to use facilities designated for the opposite biological sex
- We will not change a child's records to show a different sex from their biological sex
- We will not make assumptions about what a child wants or needs based on their appearance or behaviour
- We will not pressure or encourage a child to adopt a particular gender identity
- We will not treat questioning gender identity as something that must be affirmed without careful consideration

Recording biological sex:

We are legally required to record a child's biological sex accurately wherever it is recorded in school systems and documents. This includes:

- Admissions records
- The school census
- Medical records
- Safeguarding records
- Examination entries
- Any other records where sex is recorded

We will not change these records to show a different sex, regardless of any social transition.

Staff responsibilities:

All staff must:

- Be aware of these requirements and follow them
- Not make assumptions about a child's wishes regarding social transition
- Create a culture where all pupils feel safe to speak out or share concerns
- Report any concerns about a child's wellbeing in relation to gender identity to the DSL
- Not initiate discussions about social transition
- Refer any requests for support with social transition to the DSL

- Maintain confidentiality and handle all discussions with sensitivity
- Not make any changes (e.g., using different names or pronouns) without clear guidance from senior leadership and parental involvement

Supporting all pupils:

We recognise that:

- Some pupils may be questioning their gender identity
- Some pupils may not conform to gender stereotypes
- Some pupils may experience distress related to their gender
- All pupils deserve to feel safe, respected and supported

We will support all pupils by:

- Creating an inclusive environment where all pupils feel valued
- Challenging bullying, harassment and discrimination of any kind
- Providing access to pastoral support and mental health services
- Working with families to provide appropriate support
- Ensuring pupils know they can speak to trusted adults about any concerns
- Not making assumptions about pupils based on their appearance or interests

Seeking clinical advice:

Where families are making decisions about support for gender questioning pupils, we will encourage them to seek clinical help and advice. This should be done as early as possible, particularly when supporting pre-pubertal children.

We will work with any healthcare professionals involved in a child's care and consider their advice as part of our decision-making.

Confidentiality and information sharing:

- Information about a child's gender identity is sensitive and will be handled confidentially
- We will only share information on a need-to-know basis
- We will consider carefully who needs to know and why
- We will balance the child's right to privacy with safeguarding requirements
- We will follow our usual information sharing protocols as set out in Section 6 of this policy

Review:

Any arrangements put in place to support a gender questioning pupil will be reviewed regularly (at least termly) to ensure they remain appropriate and in the child's best interests.

Further guidance:

Staff should speak to the DSL if they have any questions or concerns about these requirements. The DSL will seek advice from the local authority, legal advisors, or other relevant professionals as needed.

14. Complaints and concerns about school safeguarding policies

14.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

14.2 Other complaints

Please refer to our complaints policy for how other complaints relating to safeguarding must be dealt with

14.3 Whistle-blowing

Please refer to our whistle-blowing policy which covers concerns regarding the way the school safeguards pupils – including poor or unsafe practice, or potential failures.

15. Record-keeping

We will hold records in line with our records retention schedule. Refer to our Checklist for annual review of school records and safe data destruction.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing on CPOMs. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

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

Concerns and referrals will be kept in a separate child protection file for each child. Records are kept within the school's secure CPOMS system.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

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

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

5 days for an in-year transfer, or within

The first 5 days of the start of a new term

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

Currently our safeguarding record-keeping arrangements are:

- From January 2024, records are kept in the secure CPOMS system. Users have been given appropriate access to their role. Higher level users have 2 level authentication in place.
- Previous paper records are held in a locked cupboard with the key stored in a safe

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

16. Training

16.1 All staff

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

This training will be regularly updated and will:

Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning

Be in line with advice from the 3 safeguarding partners

Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring

Have regard to the Teachers' Standards to support the expectation that all teachers:

Manage behaviour effectively to ensure a good and safe environment

Have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

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

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

Volunteers will receive appropriate training, if applicable.

16.2 The DSL and deputies

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

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

They will also undertake Prevent awareness training.

16.3 Trustees

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

Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge

Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

As the chair of trustees may be required to act as the 'case manager' in the event that an allegation of abuse is made against the CEO, they receive training in managing allegations for this purpose.

16.4 Recruitment – interview panels

At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See appendix 2 of this policy for more information about our safer recruitment procedures.

16.5 Staff who have contact with pupils and families

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

17. Monitoring arrangements

This policy will be reviewed **annually** by Mrs Sandra Govender, CEO. At every review, it will be approved by the full trust board.

Important note: This policy has been updated in July 2026 to reflect the changes in Keeping Children Safe in Education 2026, which comes into effect in September 2026. Key changes include:

- Removal of the supervision exemption for volunteers
- Updated terminology for making or sharing of nudes or semi-nudes
- New requirements regarding facilities for biological sex and social transition
- Enhanced filtering and monitoring review requirements
- Recognition of new forms of exploitation and abuse
- Expanded guidance on AI risks

All staff must familiarize themselves with these changes before September 2026.

18. Links with other policies

This policy links to the following policies and procedures:

Behaviour
Staff code of conduct
Complaints
Health and safety
Attendance
ESafety and Online safety
Equality
Relationships and sex education
First aid
Curriculum
Designated teacher for looked-after and previously looked-after children
Privacy notices
Whistle-blowing policy
Antibullying policy

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: types of abuse

Forms of exploitation recognised by KCSIE 2026

KCSIE 2026 explicitly recognises the following forms of exploitation as safeguarding concerns:

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour.

This can include:

- Children being forced to work in cannabis factories
- Children being trafficked for sexual exploitation
- Children being forced into domestic servitude
- Children being forced to commit crimes (including county lines drug trafficking)
- Children being forced to work in nail bars, car washes, or other businesses
- Children being moved around the country or internationally for exploitation

Indicators of modern slavery may include:

- Signs of physical or emotional abuse
- Appearing malnourished, unkempt or withdrawn
- Isolation from the community and social networks
- Restricted freedom of movement
- Unusual travel patterns

- Poor living conditions
- Few or no personal possessions
- Fear of authorities
- Lack of access to medical care or education

Financial exploitation includes:

- Children being coerced into fraudulent activity
- Children having their benefits or money taken by others
- Children being forced into debt bondage
- Children being exploited through online scams or fraud
- Children being pressured to take out loans or credit in their name
- Children being used to launder money
- Children being forced to hand over earnings or benefits

Indicators of financial exploitation may include:

- Unexplained lack of money or inability to pay for necessities
- Bank accounts being used by others
- Receiving letters about debts or credit
- Being secretive about finances
- Having possessions that don't match their financial situation
- Signs of coercion or control by others

If staff have any concerns that a child may be experiencing modern slavery or financial exploitation, they should report this to the DSL immediately.

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

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

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

Emotional abuse may involve:

Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person

Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate

Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction

Seeing or hearing the ill-treatment of another

Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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:

- **Rape:** penetration of the vagina, anus or mouth with a penis, without consent
- **Assault by penetration:** penetration of the vagina or anus with any body part or object, without consent
- **Sexual assault:** intentional sexual touching without consent
- Other non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing

Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (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.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

Provide adequate food, clothing and shelter (including exclusion from home or abandonment)

Protect a child from physical and emotional harm or danger

Ensure adequate supervision (including the use of inadequate care-givers)

Ensure access to appropriate medical care or treatment

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

Appendix 2: safer recruitment and DBS checks – policy and procedures

Safer recruitment policy

Recruitment and selection process

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

Our school's commitment to safeguarding and promoting the welfare of children

That safeguarding checks will be undertaken

The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children

Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)

Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

Our shortlisting process will involve at least 2 people and will:

Consider any inconsistencies and look for gaps in employment and reasons given for them

Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:

If they have a criminal history

Whether they are included on the barred list

Whether they are prohibited from teaching

Information about any criminal offences committed in any country in line with the law as applicable in England and Wales

Any relevant overseas information

Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

Not accept open references

Liaise directly with referees and verify any information contained within references with the referees

Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations

Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed

Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children

Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate

Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this

Explore any potential areas of concern to determine the candidate's suitability to work with children

Record all information considered and decisions made

Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed, we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards

- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
- For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
- For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state

* Management positions are most likely to include, but are not limited to, headteachers, heads of school, principals and deputy/assistant headteachers.

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

Regulated activity means a person who will be:

Responsible, on a regular basis in a school for teaching, training, instructing, caring for or supervising children; or

Carrying out paid, or unsupervised unpaid, work regularly in a school where that work provides an opportunity for contact with children; or

Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

There are concerns about an existing member of staff's suitability to work with children; or

An individual moves from a post that is not regulated activity to one that is; or

There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

We believe the individual has engaged in [relevant conduct](#); or

We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or

We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and

The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

An enhanced DBS check with barred list information for contractors engaging in regulated activity

An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

Important change from September 2026: The Crime and Policing Act 2026 has removed the previous 'supervision exemption' for volunteers. This significantly changes how we must approach DBS checks for volunteers.

New legal requirements:

Any volunteer who **frequently** teaches, trains, instructs, or supervises children is now legally in **regulated activity** and requires an enhanced DBS check with barred list information, **regardless of whether they are supervised**.

'Frequently' means:

- Once a week or more; or
- On 4 or more days in a 30-day period; or
- Overnight (between 2am and 6am)

Our policy:

We will:

- **Obtain an enhanced DBS check with barred list information for ALL volunteers who frequently teach, train, instruct, or supervise children.** This is now a legal requirement regardless of whether they are supervised.
- Never allow any volunteer who has not had the appropriate DBS check to work in regulated activity
- For volunteers who do **not** meet the 'frequently' threshold and are not in regulated activity (e.g., one-off volunteers at school events), we will:
 - Carry out a risk assessment to determine whether an enhanced DBS check (without barred list information) is appropriate
 - Ensure these volunteers are supervised at all times by a member of staff who has been appropriately checked
 - Retain a record of the risk assessment, including our evaluation of any risks and control measures put in place
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.
- Obtain references for volunteers who will be working regularly with children
- Verify the identity of all volunteers
- Ensure volunteers understand and agree to follow our safeguarding policies, including this child protection policy and our code of conduct
- Provide appropriate safeguarding training and induction for volunteers
- Ensure volunteers know who the DSL is and how to report concerns

Examples of volunteers who will require enhanced DBS checks with barred list information:

- Sports coaches who work with pupils weekly
- Music teachers who provide weekly lessons
- Regular classroom volunteers who attend weekly
- Volunteers who help with after-school clubs that run weekly

- Volunteers on residential trips (overnight activity)
- Any volunteer who works with pupils on 4 or more days in a 30-day period

Examples of volunteers who may not require enhanced DBS checks (subject to risk assessment):

- One-off volunteers at school fairs or events (if supervised)
- Parents helping with a single school trip (if supervised)
- Volunteers helping with occasional activities (less than weekly, if supervised)

Important notes:

- The previous 'supervision exemption' no longer applies
- We cannot rely on supervision to avoid the need for DBS checks for frequent volunteers
- All decisions about volunteer checks will be documented
- We will review our volunteer arrangements regularly to ensure compliance

Supervision of volunteers:

Where volunteers are supervised (i.e., those not in regulated activity), supervision must be:

- By a person who is in regulated activity
- Regular and day-to-day
- Reasonable in all the circumstances to ensure the protection of children

The person supervising must be able to see and monitor the volunteer's activities at all times.

Trustees and members

All trustees, local governors and members will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

The chair of the board of members will have their DBS check countersigned by the secretary of state.

All proprietors, trustees, local governors and members will also have the following checks:

A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)).

- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Pupils staying with host families

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

Appendix 3: allegations of abuse made against staff

Allegations against staff (including low-level concerns) policy

Section 1: allegations that may meet the harm threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or

- Possibly committed a criminal offence against or related to a child, and/or

- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or

Behaved or may have behaved in a way that indicates they may not be suitable to work with children
– this includes behaviour taking place both inside and outside of school

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

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

A 'case manager' will lead any investigation. This will be the CEO, or the chair of trustees and/or proprietor where the CEO is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

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

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned

- Providing an assistant to be present when the individual has contact with children

- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children

- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted

- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the academy trust

If in doubt, the case manager will seek views from the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation

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

False: there is sufficient evidence to disprove the allegation

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care

If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details

If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate

- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

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

Additional considerations for supply teachers and all contracted staff

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

We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome

The trust board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation

We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required

We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

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

Timescales

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

Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week

If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days

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

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

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

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

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the

allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

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

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

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

Record-keeping

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

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

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

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

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

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

References

When providing employer references, we will:

Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious

Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

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

This will include consideration of (as applicable):

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

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

Non-recent allegations

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

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

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

Section 2: Concerns that do not meet the harm threshold

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

Concerns may arise through, for example:

Suspicion

Complaint

Safeguarding concern or allegation from another member of staff

Disclosure made by a child, parent or other adult within or outside the school

Pre-employment vetting checks

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

Definition of low-level concerns

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

Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**

Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

Being overly friendly with children

Having favourites

Taking photographs of children on their mobile phone

Engaging with a child on a one-to-one basis in a secluded area or behind a closed door

Humiliating pupils

Sharing low-level concerns

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

We will create this culture by:

Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others

Empowering staff to share any low-level concerns as per section 7.7 of this policy

Empowering staff to self-refer

Addressing unprofessional behaviour and supporting the individual to correct it at an early stage

Providing a responsive, sensitive and proportionate handling of such concerns when they are raised

Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

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

Directly to the person who raised the concern, unless it has been raised anonymously

To the individual involved and any witnesses

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

We will refer to Developing and implementing a low-level concerns policy: A guide for organisations which work with children for more information.

Record keeping

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

Records will be:

Kept confidential, held securely and comply with the DPA 2018 and UK GDPR

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

Retained at least until the individual leaves employment at the school

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

References

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

The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or

The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Appendix 4: specific safeguarding issues

Children who are absent from education

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

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

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual

exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

Appearing with unexplained gifts or new possessions

Associating with other young people involved in exploitation

Suffering from changes in emotional wellbeing

Misusing drugs and alcohol

Going missing for periods of time or regularly coming home late

Regularly missing school or education

Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

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

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

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

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

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

Having an older boyfriend or girlfriend

Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online and can occur simultaneously between the 2.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)

- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

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

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma and will offer them appropriate support.

Domestic abuse

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

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

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

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

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead)

before the child or children arrive at school the following day. The school works with Operation Encompass. The Key Adult DSL for Operation Encompass is Sandra Govender.

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

Child to parent abuse

Understanding child to parent abuse

Child to parent abuse (also known as child to parent violence, adolescent to parent violence and abuse, or APVA) is any harmful act by a young person (usually but not exclusively a teenager) intended to gain power and control over a parent, carer or other family member.

This is a growing safeguarding concern that is often hidden and under-reported. Parents may feel ashamed, blame themselves, or fear that seeking help will result in their child being removed from their care.

Types of child to parent abuse

Child to parent abuse can include:

Physical violence or threats of violence:

- Hitting, kicking, pushing, scratching, biting
- Throwing objects at the parent
- Threatening physical harm
- Damaging property in a threatening way
- Using weapons or threatening to use weapons

Verbal abuse:

- Shouting, swearing, name-calling
- Making threats
- Humiliating or belittling the parent
- Constant criticism

Emotional or psychological abuse:

- Manipulation and intimidation
- Making the parent feel afraid
- Isolating the parent from friends and family
- Exploiting the parent's vulnerabilities
- Playing on parental guilt

Financial abuse:

- Stealing money or possessions
- Forcing parents to buy things
- Running up debts in the parent's name
- Demanding money with threats
- Taking control of the parent's finances
- Preventing the parent from working

Damage to property:

- Breaking or damaging household items
- Punching holes in walls or doors
- Damaging the parent's possessions
- Damaging property belonging to siblings

Controlling behaviour:

- Dictating what the parent can and cannot do
- Controlling who the parent sees
- Controlling what the parent wears
- Making excessive demands on the parent's time and attention

Indicators that a child may be perpetrating abuse towards a parent/carer

Indicators in the child:

- Difficulties managing emotions and behaviour
- History of trauma or adverse childhood experiences
- Exposure to domestic abuse (either as a victim or witness)
- Mental health difficulties, including anxiety, depression, or conduct disorders
- Substance misuse
- Learning disabilities or neurodevelopmental conditions (e.g., ADHD, ASD)
- Sense of entitlement
- Lack of empathy
- Difficulties with boundaries and authority
- Involvement with negative peer groups
- Exposure to harmful content online (e.g., violent content, misogynistic content)

Indicators in the parent/carer:

- Appearing anxious, stressed, frightened or depressed
- Visible injuries (bruises, scratches, etc.)
- Making excuses for their child's behaviour
- Minimising the severity of the behaviour
- Reluctance to discuss home life or their child's behaviour
- Appearing exhausted or overwhelmed
- Expressing feelings of failure as a parent
- Isolation from friends and family
- Financial difficulties
- Missing work or appointments
- Appearing to "walk on eggshells" around their child

Indicators in the family:

- High levels of tension and conflict
- Siblings appearing fearful or distressed
- Other family members being affected by the behaviour
- Family avoiding spending time together
- Damage to property in the home

Why child to parent abuse happens

Child to parent abuse can happen for many reasons, including:

- The child has experienced trauma or abuse themselves
- The child has witnessed domestic abuse
- The child has learned that violence and control are effective ways to get what they want
- The child has mental health difficulties or neurodevelopmental conditions that affect their ability to manage emotions and behaviour
- The child is experiencing difficulties at school or with peers
- The child is being influenced by negative peers or harmful content online
- Family breakdown or changes in family structure
- Lack of boundaries or inconsistent parenting (though this is not to blame parents)
- Substance misuse by the child

Important note: Child to parent abuse is **not** the parent's fault. While parenting approaches can be part of the solution, parents should not be blamed for their child's abusive behaviour.

Our response

If staff have concerns that a child may be perpetrating abuse towards a parent/carer:

- 1. Report to the DSL immediately**
 - a. Share your concerns with the DSL
 - b. Provide details of what you have observed or been told
 - c. Record your concerns on CPOMS
- 2. DSL will assess the situation**
 - a. Consider the safety of the parent/carer and any siblings
 - b. Consider the needs of the child (who may themselves be experiencing harm)
 - c. Consider whether a referral to children's social care is needed
 - d. Consider whether adult social care needs to be involved (if the parent has care needs)
 - e. Assess whether there are immediate safety concerns
- 3. Work with the family**
 - a. Approach the situation with sensitivity and without judgement
 - b. Recognise that parents may feel ashamed or afraid to ask for help
 - c. Reassure parents that they are not to blame
 - d. Work with the family to understand what is happening
 - e. Discuss what support might be helpful
- 4. Make referrals to appropriate services**
 - a. Children's social care (if the child is at risk of harm or has additional needs)
 - b. Early help services

- c. CAMHS (Child and Adolescent Mental Health Services)
 - d. Specialist child to parent abuse services (if available locally)
 - e. Parenting support services
 - f. Domestic abuse services (some now support child to parent abuse)
 - g. Police (if there are criminal offences or immediate safety concerns)
- 5. Provide support within school**
- a. Provide pastoral support to the child
 - b. Consider whether there are underlying issues at school (e.g., bullying, academic pressure)
 - c. Work with the child on emotional regulation and behaviour management
 - d. Provide a safe space for the child to talk about their feelings
 - e. Monitor the child's wellbeing and behaviour
 - f. Maintain regular contact with the family
- 6. Take a non-judgemental approach**
- a. Recognise that this is a complex issue
 - b. Avoid blaming the parent or the child
 - c. Understand that parents may have tried many strategies already
 - d. Recognise that parents may be experiencing trauma
 - e. Be aware that parents may fear their child being removed from their care
 - f. Provide reassurance and support

Important considerations

Safeguarding the child:

- Remember that the child may themselves be a victim of abuse or trauma
- Consider whether the child is being harmed or is at risk of harm
- Consider whether the child has additional needs that are not being met
- Ensure the child receives appropriate support

Safeguarding siblings:

- Consider the impact on any siblings in the household
- Assess whether siblings are safe
- Provide support to siblings if needed

Supporting the parent/carer:

- Recognise that the parent may be experiencing trauma
- Provide information about sources of support
- Reassure them that they are not alone
- Avoid victim-blaming language
- Respect their expertise about their own child and family

Confidentiality:

- Balance the need to protect confidentiality with safeguarding requirements
- Be mindful that the child may be aware of any contact with the parent
- Consider safety implications of any communication with the family

Cultural sensitivity:

- Be aware that attitudes towards child to parent abuse may vary across cultures
- Approach all families with cultural sensitivity and respect
- Ensure support is culturally appropriate

Prevention

We will work to prevent child to parent abuse through:

- Teaching about healthy relationships, including family relationships, in our RSHE curriculum
- Teaching about respect, empathy and managing emotions
- Providing support to children who have experienced trauma or adverse childhood experiences
- Identifying and supporting children with mental health difficulties or neurodevelopmental conditions
- Working with parents to provide parenting support where needed
- Creating a culture where families feel able to ask for help
- Raising awareness among staff about child to parent abuse

Staff responsibilities

All staff should:

- Be aware that child to parent abuse exists and can happen in any family
- Be alert to signs that a child may be perpetrating abuse towards a parent/carer
- Report any concerns to the DSL
- Approach the issue with sensitivity and without judgement
- Not blame parents for their child's behaviour
- Recognise that both the child and parent may need support

Resources and support

Local services that can provide support include:

- Children's social care: 0344 800 8020
- Early help services: [Early help for children and families - Norfolk County Council](#)
- CAMHS: 0300 790 0371
- Local domestic abuse services: 0300 561 0555
- Police: 101 (or 999 in an emergency)

National organisations:

- Family Lives: 0808 800 2222 / www.familylives.org.uk
- YoungMinds Parent Helpline: 0808 802 5544

Homelessness

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

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

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

Temporary accommodation notification duty

Understanding the duty

From September 2026, KCSIE 2026 includes information about the temporary accommodation notification duty placed on local housing authorities.

When a local housing authority accommodates a family with children in temporary accommodation, they have a duty to notify:

- The relevant local authority children's social care team
- The relevant education authority (if different)

This notification must include information about the family and their circumstances to enable appropriate support to be provided.

Why this matters for safeguarding

Children living in temporary accommodation may face additional risks and vulnerabilities, including:

Housing instability:

- Frequent moves between different temporary accommodations
- Uncertainty about how long they will be in each location
- Lack of a stable, permanent home
- Living in unsuitable accommodation (e.g., bed and breakfasts, hostels)

Educational disruption:

- Changes of school
- Disruption to learning and friendships
- Difficulty accessing education if accommodation is far from school
- Lack of space to do homework
- Difficulty concentrating due to stress and instability

Financial hardship:

- Families may be experiencing poverty
- Difficulty affording school uniform, trips, equipment
- Stress related to financial difficulties

Family stress:

- Parents/carers may be experiencing high levels of stress

- Family relationships may be strained
- Parents/carers may have mental health difficulties
- Domestic abuse may be a factor (families fleeing domestic abuse often need temporary accommodation)

Social isolation:

- Lack of support networks in the new area
- Difficulty maintaining friendships
- Isolation from extended family
- Stigma associated with living in temporary accommodation

Increased safeguarding risks:

- Children may be at increased risk of abuse or neglect due to family stress
- Children may be more vulnerable to exploitation
- Children may be exposed to harmful environments in temporary accommodation
- Parents/carers may be less able to protect their children due to their own difficulties

Our response

When we become aware that a pupil is living in temporary accommodation:

- 1. The DSL will be informed immediately**
 - a. Staff should report to the DSL if they become aware a pupil is in temporary accommodation
 - b. This may come from the pupil, parent/carer, or notification from the local authority
- 2. The DSL will liaise with relevant agencies**
 - a. Contact the local authority to understand the family's circumstances
 - b. Establish what support is already in place
 - c. Identify any additional support needs
 - d. Ensure appropriate information sharing
- 3. We will ensure continuity of education**
 - a. Make every effort to keep the child in our school, even if they move to temporary accommodation some distance away
 - b. Provide transport support if needed and possible
 - c. Ensure the child can access remote learning if necessary
 - d. Provide additional academic support if the child has missed learning
 - e. Be flexible about homework expectations given the child's circumstances
- 4. We will provide additional support**
 - a. Assign a key adult the child can talk to
 - b. Provide pastoral support
 - c. Monitor the child's wellbeing closely
 - d. Be alert to signs of additional stress or difficulties
 - e. Provide practical support where possible (e.g., breakfast club, after-school clubs, access to devices)
 - f. Consider whether financial support is available (e.g., for uniform, trips)
- 5. We will be alert to safeguarding concerns**
 - a. Recognise that the child may be at increased risk
 - b. Monitor for signs of abuse, neglect or exploitation

- c. Be particularly alert to:
 - i. Changes in behaviour or presentation
 - ii. Signs of distress or anxiety
 - iii. Deterioration in attendance or punctuality
 - iv. Decline in academic performance
 - v. Social withdrawal
 - vi. Physical signs of neglect
 - d. Take action promptly if concerns arise
- 6. We will work with the family**
- a. Maintain regular communication with parents/carers
 - b. Provide information about sources of support
 - c. Be understanding of the challenges the family is facing
 - d. Avoid adding to the family's stress where possible
 - e. Signpost to relevant services (e.g., housing advice, benefits advice, food banks)
- 7. We will maintain detailed records**
- a. Record the child's temporary accommodation address
 - b. Keep records of any moves
 - c. Record any support provided
 - d. Record any safeguarding concerns
 - e. Ensure records are up to date and accessible

If a child moves to a different school

If a child in temporary accommodation needs to move to a different school:

- We will ensure a smooth transition
- We will share relevant information with the new school promptly and securely
- We will ensure safeguarding information is shared appropriately
- We will ensure the child's education is not disrupted more than necessary

Staff responsibilities

All staff should:

- Be aware that children in temporary accommodation may face additional challenges
- Be alert to signs that a child may be living in temporary accommodation
- Report to the DSL if they become aware a child is in temporary accommodation
- Be understanding and supportive of children and families in this situation
- Avoid stigmatising language or attitudes
- Be alert to safeguarding concerns

Prevention and early intervention

Where possible, we will:

- Work with families to identify housing difficulties early
- Signpost families to housing advice and support services
- Work with the local authority to prevent homelessness where possible

- Provide information about families' rights and entitlements

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

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

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

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

FGM

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

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

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues

A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

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

The girl's family having a history of practising FGM (this is the biggest risk factor to consider)

FGM being known to be practised in the girl's community or country of origin

A parent or family member expressing concern that FGM may be carried out

A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

Forced marriage

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

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

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

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

Speak to the pupil about the concerns in a secure and private place

Activate the local safeguarding procedures and refer the case to the local authority's designated officer

Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmufco.gov.uk

Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

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

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

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

Terrorism is an action that:

Endangers or causes serious violence to a person/people;

Causes serious damage to property; or

Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

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

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

Staff will be alert to changes in pupils' behaviour.

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

Refusal to engage with, or becoming abusive to, peers who are different from themselves

Becoming susceptible to conspiracy theories and feelings of persecution

Changes in friendship groups and appearance

Rejecting activities they used to enjoy

Converting to a new religion

Isolating themselves from family and friends

Talking as if from a scripted speech

An unwillingness or inability to discuss their views

A sudden disrespectful attitude towards others

Increased levels of anger

Increased secretiveness, especially around internet use

Expressions of sympathy for extremist ideologies and groups, or justification of their actions

Accessing extremist material online, including on Facebook or Twitter/X

Possessing extremist literature

Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

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

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

Harmful sexual behaviour (HSB)

Understanding HSB

Harmful sexual behaviour (HSB) from children is not always contrived or with the intent to harm others. There is a wide continuum of sexual behaviours and it is important to distinguish between:

- **Healthy sexual development and behaviour:** Age-appropriate sexual curiosity, exploration and behaviour
- **Problematic sexual behaviour:** Behaviour that is outside of normal development and may cause concern
- **Harmful sexual behaviour:** Behaviour that is developmentally inappropriate, may be harmful to the child or others, and may be abusive

HSB can range from:

- Inappropriate sexual language
- Inappropriate role play
- Sexual touching of another person
- Sexual assault or abuse

It is important to understand that:

- HSB exists on a continuum from less serious to very serious
- Not all HSB is intentionally harmful
- Children displaying HSB may themselves be vulnerable and in need of support
- Children displaying HSB may themselves have been abused or exposed to harmful sexual content
- Early intervention can prevent escalation to more serious behaviour

Understanding typical sexual development

Staff should be aware of typical stages of sexual development to help identify when behaviour may be harmful. The NSPCC provides guidance on what is age-appropriate sexual behaviour at different stages:

Early years (0-5 years):

- Curiosity about body parts
- Touching own genitals
- Asking questions about bodies and reproduction
- Playing 'doctors and nurses' with same-age children

Primary age (5-11 years):

- Increased awareness of gender differences
- Interest in reproduction and where babies come from
- Use of sexual language (may be without understanding)
- Awareness of privacy and modesty

Secondary age (11-18 years):

- Increased sexual awareness and interest
- Romantic relationships
- Sexual experimentation (age-appropriate)
- Interest in pornography (though exposure to pornography is harmful)

Behaviour that may indicate concern includes:

- Sexual behaviour that is significantly different from that of other children of the same age
- Behaviour that involves coercion, force or bribery
- Behaviour that involves significant age or developmental differences
- Behaviour that is secretive or compulsive
- Sexual behaviour directed at adults
- Behaviour that causes distress to the child or others
- Behaviour that involves the use of technology to access or share sexual content

Understanding consent

A critical part of understanding HSB is understanding consent. Staff should be aware that:

Consent is:

- About having the freedom and capacity to choose

- Given when someone agrees by choice and has the freedom and capacity to make that choice
- Ongoing – it can be withdrawn at any time
- Specific – consenting to one activity doesn't mean consenting to another
- Informed – the person must understand what they are consenting to

Consent is never present when:

- Someone is asleep or unconscious
- Someone has been drugged or is under the influence of alcohol or drugs
- Someone has been groomed, manipulated or coerced
- Someone is under 13 (they cannot consent in law)
- There is an imbalance of power (e.g., significant age difference, position of trust, vulnerability)
- Someone has a disability that means they cannot consent
- Someone is being threatened or is fearful

Children under 13:

- Children under 13 can never legally consent to sexual activity
- Any sexual activity involving a child under 13 is always a safeguarding concern
- This applies even if the child says they consented

Children aged 13-15:

- Sexual activity involving children aged 13-15 is illegal
- However, we recognise that some sexual activity between young people of similar ages may be developmentally appropriate
- We will assess each situation individually, considering factors such as age difference, power imbalance, and whether there was genuine consent

Our response to HSB

When HSB is identified, we will:

Immediate response:

- Ensure the immediate safety of all children involved
- Separate the children involved if necessary
- Provide reassurance and support to any victims
- Report the incident to the DSL immediately
- Record the incident on CPOMS with full details

Assessment:

- The DSL will assess the incident, considering:
 - The ages and developmental stages of the children involved
 - The nature and context of the behaviour
 - Whether there was consent (understanding the limitations on children's capacity to consent)
 - Any power imbalance between the children
 - Whether the behaviour was a one-off or part of a pattern
 - The impact on the victim(s)
 - Whether the child displaying HSB may themselves be a victim of abuse

Decision-making:

- The DSL will decide on the appropriate response, which may include:
 - Managing the behaviour through our behaviour policy
 - Providing education and support to the child displaying HSB
 - Making a referral to children's social care
 - Involving other agencies (e.g., police, CAMHS)
 - Implementing a safety plan
 - Taking disciplinary action if appropriate

Support:

- We will provide appropriate support to all children involved:
 - **For victims:** Reassurance, counselling, safety planning, ongoing monitoring
 - **For children displaying HSB:** Recognition that they may be vulnerable, assessment of their needs, appropriate support and intervention, clear boundaries and expectations
 - **For witnesses:** Support to process what they have seen, reassurance about their safety

Working with parents/carers:

- We will involve parents/carers appropriately, balancing:
 - The need to keep parents informed
 - The need to protect children's privacy
 - Safeguarding considerations
 - Advice from other agencies

Referral to other agencies:

- We will make referrals to children's social care where:
 - A child under 13 has been involved in any sexual activity
 - There is a significant age or developmental difference between children
 - There are concerns that a child has been harmed or is at risk of harm
 - There are concerns that a child displaying HSB may themselves be a victim of abuse
 - The behaviour is serious or persistent
 - There are concerns about a child's welfare

Recording:

- All incidents of HSB will be recorded on CPOMS with full details
- Records will include the actions taken and the rationale for decisions
- Records will be reviewed regularly to identify any patterns

Prevention:

- We will work to prevent HSB through:
 - Age-appropriate relationships and sex education (RSHE)
 - Teaching about consent, healthy relationships and boundaries
 - Creating a culture where children feel safe to report concerns
 - Challenging inappropriate language and behaviour
 - Educating children about the risks of pornography and harmful sexual content
 - Monitoring children's online activity

Staff responsibilities

All staff should:

- Be aware of what constitutes HSB
- Understand typical sexual development for different ages
- Be alert to signs of HSB
- Challenge inappropriate sexual language or behaviour
- Report any concerns to the DSL immediately
- Not dismiss behaviour as "just growing up" or "boys being boys"
- Recognise that children displaying HSB may themselves need support

Sexual violence and sexual harassment between children

Understanding sexual violence and sexual harassment

Sexual violence and sexual harassment sit at the more severe end of the continuum from harmful sexual behaviour. These are serious safeguarding issues that require immediate action.

Sexual violence includes offences under the Sexual Offences Act 2003:

- **Rape:** penetration of the vagina, anus or mouth with a penis, without consent. This is a criminal offence.
- **Assault by penetration:** penetration of the vagina or anus with any body part or object, without consent. This is a criminal offence.
- **Sexual assault:** intentional sexual touching without consent. This is a criminal offence.

Important points about sexual violence:

- These are criminal offences
- They can be committed by children against other children
- The age of criminal responsibility is 10
- Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police
- Even if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Consent is explained in the HSB section above – children under 13 can never consent in law

Sexual harassment means unwanted conduct of a sexual nature that violates a child's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment for them.

Sexual harassment can include:

- **Sexual comments:** Telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, calling someone sexualised names
- **Sexual "jokes" or taunting**
- **Physical behaviour:** Deliberately brushing against someone, interfering with someone's clothes, displaying pictures, photos or drawings of a sexual nature
- **Online sexual harassment:** This may include:
 - Non-consensual sharing of sexual images and videos (see Section 7.9 on making or sharing of nudes or semi-nudes)

- Sharing of AI-generated sexual images (see Section 7.9)
- Sexualised online bullying
- Unwanted sexual comments and messages, including on social media
- Sexual exploitation, coercion and threats
- Pressuring someone to share sexual images

Upskirting is a specific criminal offence under the Voyeurism (Offences) Act 2019. It typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

The gendered nature of sexual violence and harassment

We recognise that:

- Sexual violence and sexual harassment can happen to anyone, regardless of gender
- However, research shows that it is more likely to be girls who are victims and boys who are perpetrators
- This does not mean we should make assumptions – we will treat all reports seriously regardless of the gender of those involved
- We recognise that boys can be victims and girls can be perpetrators
- We recognise that sexual violence and harassment can occur in same-sex relationships

We will:

- Challenge sexist attitudes and behaviour
- Challenge misogyny (prejudice against women and girls) and misandry (prejudice against men and boys)
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Not tolerate victim-blaming or dismissive attitudes

Our response to sexual violence and sexual harassment

Sexual violence and sexual harassment will **never** be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". Such attitudes can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

If a pupil makes an allegation of sexual violence or sexual harassment:

1. Listen and believe

- a. Take the report seriously
- b. Reassure the victim that they are being taken seriously and that they will be supported and kept safe
- c. Do not promise confidentiality – explain that you will need to pass the information on
- d. Do not interrogate the victim or ask leading questions
- e. Record the conversation as soon as possible using the victim's own words

2. Report immediately to the DSL

- a. Do not investigate yourself
- b. Pass all information to the DSL

- c. Record the report on CPOMS

3. DSL immediate actions

- a. Assess the immediate risk to the victim and other pupils
- b. Consider whether the police and/or children's social care need to be contacted immediately
- c. Consider whether a referral should be made to children's social care and/or the police
- d. Make a referral if appropriate (see below)
- e. Put immediate safety measures in place

When to report to police and/or children's social care:

The DSL will make a referral to children's social care and/or the police where:

- A report of rape, assault by penetration or sexual assault is made (these are crimes and should be reported to police)
- There are concerns that a child has been harmed or is at risk of harm
- The alleged perpetrator is an adult
- There are wider safeguarding concerns

Risk assessment and safety planning:

The DSL will:

- Conduct a risk assessment considering:
 - The victim(s)
 - The alleged perpetrator(s)
 - Other children at the school
 - The victim and alleged perpetrator sharing classes, corridors, transport, etc.
- Put a safety plan in place that includes:
 - Measures to protect the victim
 - Measures to manage the alleged perpetrator
 - Support for both parties
 - A named person each child can talk to
 - Consideration of school transport as a potentially vulnerable place
- Review the risk assessment regularly

Possible actions may include:

- Moving the alleged perpetrator out of classes shared with the victim
- Ensuring the victim and alleged perpetrator do not share transport
- Ensuring the victim and alleged perpetrator do not share unsupervised spaces
- Providing additional supervision
- Adjusting timetables
- In serious cases, considering suspension of the alleged perpetrator (see below on suspension)

Support for victims:

We will provide support for victims including:

- A named trusted adult they can talk to
- Access to counselling or therapeutic support
- Regular check-ins to ensure they feel safe

- Support to continue their education
- Protection from bullying or harassment
- Reassurance that they are being taken seriously
- Clear communication about what will happen next

Important principles for supporting victims:

- Reassure them that they are being taken seriously
- Reassure them that they will be supported and kept safe
- Never blame the victim or make them feel ashamed
- Recognise that it is likely to be traumatic for them
- Understand that they may not want to talk about it
- Respect their wishes where possible, but balance this with the need to protect them and others
- Be aware that they may experience a range of emotions
- Provide ongoing support, not just immediate support

Managing the alleged perpetrator:

We will:

- Recognise that the alleged perpetrator is also likely to be a child who may be vulnerable
- Consider whether the alleged perpetrator may themselves have been abused or exposed to harmful content
- Provide appropriate support to the alleged perpetrator
- Make clear that the alleged behaviour is unacceptable
- Take disciplinary action if appropriate (see below)
- Consider whether a referral should be made to children's social care for the alleged perpetrator

Disciplinary action:

- Disciplinary action can be taken while other investigations are ongoing (e.g., by police)
- The fact that another body is investigating does not prevent us from taking disciplinary action
- We will consider each case individually, taking into account:
 - Whether taking action would prejudice an investigation
 - Whether there are circumstances that make it unreasonable to reach our own view
 - The severity of the alleged behaviour
 - The impact on the victim and other pupils
 - The needs of the alleged perpetrator

Suspension:

- Suspension will not be the default position
- We will only suspend an alleged perpetrator if:
 - There is reason to suspect that a child or other children are at risk of harm; or
 - The case is so serious that there might be grounds for exclusion
- We will consider alternatives to suspension (see risk assessment above)
- Any decision to suspend will be made by the Deputy Headteacher in consultation with the CEO/DSL

Working with parents/carers:

The DSL will:

- Meet with the victim's parents/carers (with the victim, if appropriate) to:
 - Explain what has been reported
 - Explain what is being put in place to safeguard their child
 - Understand their wishes in terms of support
 - Explain how the report will be progressed
 - Explain the importance of confidentiality
- Meet with the alleged perpetrator's parents/carers to:
 - Explain what has been reported
 - Explain what is being put in place (e.g., moving classes)
 - Explain the reason(s) behind any decisions
 - Discuss support for their child
- Balance the need to keep parents informed with:
 - The need to protect children's privacy
 - Confidentiality requirements
 - Advice from other agencies

Confidentiality:

- We will protect the anonymity of children involved as far as possible
- We will carefully consider which staff need to know about the report
- We will be mindful of the potential impact of social media in spreading rumours
- We will take action to prevent the sharing of information that could identify victims or alleged perpetrators
- We will explain to all parties the importance of confidentiality

If the report is found to be unsubstantiated, unfounded, false or malicious:

- We will consider whether the child who made the report needs support (it may have been a cry for help)
- If the report is shown to be deliberately invented or malicious, we will consider whether disciplinary action is appropriate
- We will provide support to the alleged perpetrator, who may have been significantly affected

Ongoing actions:

- We will keep detailed records of all actions taken
- We will review the situation regularly
- We will continue to support all children involved
- We will monitor for any signs of bullying or harassment
- We will be alert to any further reports or concerns

Creating a supportive environment and minimising risk

We recognise the importance of taking proactive action to minimise the risk of sexual violence and sexual harassment, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

Challenge inappropriate behaviour:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers
- Challenge sexist attitudes and language
- Challenge misogyny and misandry
- Challenge victim-blaming attitudes
- Make clear that sexual violence and harassment is never acceptable and will never be tolerated
- Not dismiss behaviour as "banter" or "just growing up"

Be vigilant:

- Be vigilant to issues that particularly affect different genders
- Be alert to signs that a child may be experiencing sexual violence or harassment
- Be alert to reports that may point to environmental or systemic problems
- Consider whether there are wider issues in the school or local area

Educate:

- Ensure our RSHE curriculum helps to educate pupils about:
 - Appropriate behaviour and consent
 - Healthy and respectful relationships
 - What constitutes sexual harassment and sexual violence
 - Why these behaviours are always unacceptable
 - How to recognise an abusive relationship
 - How to access support
- Ensure our curriculum is inclusive and tackles issues such as:
 - Stereotyping and prejudice
 - Equality
 - Body confidence and self-esteem
 - Awareness of coercive and controlling behaviour

Make reporting easy:

- Ensure pupils know how to report concerns
- Ensure pupils know they will be taken seriously
- Ensure pupils know they will be supported
- Make sure reporting systems are accessible and well-publicised
- Create a culture where pupils feel confident to report

Support all involved:

- Ensure victims know they will be supported and kept safe
- Provide ongoing support, not just immediate support
- Support children who have witnessed sexual violence or harassment
- Consider intra-familial harms and support siblings if needed
- Recognise that alleged perpetrators may also need support

Train staff:

- Ensure all staff are trained to understand:
 - How to recognise the indicators and signs of sexual violence and harassment
 - That it can happen in our school ("it could happen here")
 - That they should act immediately on concerns, not wait to be told

- That victims may not make a direct report (they may show signs or act in ways they hope adults will notice)
- That certain children may face additional barriers to reporting
- That a child harming a peer could be a sign they are being abused themselves
- The important role they have in preventing sexual violence and harassment
- That social media is likely to play a role in any incident

Review and improve:

- Regularly review our policies and procedures
- Learn from incidents and near-misses
- Consider whether any patterns or trends need to be addressed
- Update our approach based on new guidance and learning

Staff responsibilities

All staff must:

- Take all reports of sexual violence and sexual harassment seriously
- Report any concerns to the DSL immediately
- Not investigate themselves
- Reassure victims that they are being taken seriously
- Challenge inappropriate behaviour and language
- Be alert to signs that a child may be experiencing sexual violence or harassment
- Maintain an attitude of "it could happen here"
- Act immediately on concerns, not wait to be told

Serious violence

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

Increased absence from school

Change in friendships or relationships with older individuals or groups

Significant decline in performance

Signs of self-harm or a significant change in wellbeing

Signs of assault or unexplained injuries

Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

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

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

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book (or use the sign in app) and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as speech and language therapists, educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Non-collection of children

If a child is not collected at the end of the session/day, we will contact the parents or taxi company directly to elicit the reasons for the non-collection. If necessary, the police will be called for further assistance. The incident will be recorded as a safeguarding disclosure.

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will contact the parents or taxi company directly to elicit the reasons for the non-collection. If necessary, the police will be called for further assistance. The incident will be recorded as a safeguarding disclosure.

Appendix 5: Meeting the technical and digital standards: Audit template

Annual review completed and held on file

Rag Rating

Red - standard not met, action required

Amber – standard not met, action in progress

Green - standard met, no action required

Standards you should already be meeting

Make these standards a priority if you don't already meet them.

CATEGORY	STANDARD	RAG RATING AND NOTES
Broadband internet	Have appropriate IT security and safeguarding systems in place	
Cyber security	Protect all devices on every network with a properly configured boundary or software firewall	
	Network devices should be known and recorded with their security features enabled, correctly configured and kept up to date	
	You must conduct a data protection impact assessment (DPIA) by statute for personal data you hold as required by General Data Protection Regulation (GDPR)	
Filtering and monitoring	Identify and assign roles and responsibilities to manage your filtering and monitoring systems	

Standards to meet as soon as possible

Review your current solutions and make these standards a priority.

CATEGORY	STANDARD	RAG RATING AND NOTES
Broadband internet	Use a full fibre connection for your broadband service	
	Have a backup broadband to ensure resilience and continuity of service	
Cyber security	Accounts should only have the access they require to perform their role and should be authenticated to access data and services	
	Protect accounts with access to personal or sensitive operational data and functions by multi-factor authentication	
	Use anti-malware software to protect all devices in the network, including cloud-based networks	
	An administrator should check the security of all applications downloaded onto the network	
	All online devices and software must be licensed for use and	

	should be patched with the latest security updates	
	You should have at least 3 backup copies of important data, on at least 2 separate devices, at least 1 must be off-site	
	Your business continuity and disaster recovery plan should include a regularly tested contingency plan in response to a cyber attack	
	Serious cyber attacks should be reported	
	Train all staff with access to school IT networks in the basics of cyber security (within 12 months)	
Cloud solution	Use cloud solutions as an alternative to locally hosted systems, including servers	
	Cloud solutions should use ID and access management tools	
	Cloud solutions should work on a range of devices and be available when needed	

Servers and storage	All servers and related storage platforms should be energy-efficient and set up to reduce power consumption, while still meeting user needs	
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Standards to meet when you need to replace your current solution

If your current solution is underperforming or unsupported, you should make sure its replacement follows these standards.

You should also use these standards for new school buildings.

CATEGORY	STANDARD	RAG RATING AND NOTES
Network switching	Network switches should provide fast, reliable and secure connections to all users, both wired and wireless	
	Have a platform that can centrally manage the network switching infrastructure	
	Network switches should have security features to protect users and data from unauthorised access	
	Core network switches should be connected to at least 1 UPS to reduce the impact of outages	

Network cabling	Copper cabling should be Category 6A	
	Optical fibre cabling should be a minimum 16 core multi-mode OM4	
	New cabling should be installed and tested in line with manufacturer's guidance, warranty terms and conditions	
Wireless network	Use the latest wireless network standard approved by Wi-Fi Alliance	
	Have a fully functional signal from your wireless network throughout the school or college buildings and externally where required	
	Have a solution that can centrally manage the wireless network	
	Install security features to stop unauthorized access	