The Holy Spirit Catholic Multi Academy Company

CHILD PROTECTION & SAFEGUARDING POLICY

'With grace and humility, glorify the Lord by your life.'

This Child Protection & Safeguarding Policy has been approved and adopted by the Board of Directors of the Holy Spirit MAC in July 2025 and will be reviewed in July 2026.

Each Principal is responsible for ensuring the policy is personalised to include school specific information, that it is shared with staff, parents and the Education Standards Committee and that it is displayed on the school website.

Signed by Director of the Academy Trust Company:

Signed by the Senior Executive Principal:

The designated Director with responsibility for safeguarding is Paul Glenn.

(adapted from the model Warwickshire Safeguarding & Child Protection Policy)

St. Anne's Catholic Academy

Child protection policy

Date of publication: July 2025 Review date: July 2026

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Reviewed by:

Designated Safeguarding Lead: Tracey Gillin

Date: July 2025

Deputy Designated Safeguarding Lead: Siana Woodward,

Martyne Atkins and Patricia Finelli-Calder

Date: July 2025

Nominated Safeguarding ESC Member: Matt Davenport

Date: July 2025

1. Policy statement and principles

The Holy Spirit MAC safeguarding arrangements are inspected by Ofsted under the judgements for leadership & management and also impact the judgement on the personal development, behaviour and welfare of children and learners.

The schools safeguarding arrangements are inspected by Ofsted under the judgements for leadership & management and also impact the judgement on the personal development, behaviour and welfare of children and learners.

This policy is available on The Holy Spirit MAC website and all staff and volunteers are required to read it and confirm they have done so in writing before commencing work in school.

Child protection statement

We, the Board of the Holy Spirit Catholic Multi Academy Company and the staff and volunteers at St. Anne's Catholic Academy recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where **all** children (including those having protected characteristics under the Equalities Act 2010) are respected, valued, feel secure, are encouraged and given opportunities to talk to trusted adults who listen to them. We are alert to the signs of abuse and neglect and follow our procedures to ensure that **all** children receive effective support, protection and justice.

The procedures contained in this policy apply to all staff, volunteers and governors and are consistent with statutory guidance and those of the locally agreed multi-agency safeguarding arrangements put in place by Warwickshire Safeguarding (WS).

Policy principles:

- Safeguarding is everyone's responsibility.
- The school's responsibility to safeguard and promote the welfare of children is of paramount importance.
- All children, regardless of age, gender, ability, culture, race, language, UK residence status, religion or sexual identity, have equal rights to protection and to have their welfare promoted.
- Children who are safe and feel safe are better equipped to learn.
- This school is committed to safeguarding and promoting the welfare of children and young people and expects all staff, volunteers and parents/carers to share that commitment.
- Pupils are encouraged to talk to any member of staff about anything they are worried or distressed about. All adults working at the school are therefore expected to build trusted relationships with children, to take <u>all</u> welfare concerns seriously and always to act in the best interests of children; while remembering that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.
- Due to their day-to-day contact with pupils, staff in school are uniquely placed to observe changes in children's behaviour and the outward signs of abuse (including child on child abuse), neglect, exploitation and radicalisation. Children may also turn to a trusted adult in school when they are in distress or at risk. It is vital that all school staff are alert to the signs of abuse, maintain a professional curiosity about children, are approachable and trusted by pupils/students, listen actively to them and understand the procedures for reporting any concerns.

- The school will act on identified concerns and will provide early help to prevent concerns from escalating.
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm at home, in the community or in school.
- All staff members will maintain an attitude of 'It could happen here' where safeguarding is concerned. That includes incidents of child on child abuse.
- If, at any point, there is a risk of immediate serious harm to a child, a referral will be made to Children's Social Care and/or the Police immediately. **Anybody can make a referral**. If the child's situation does not appear to be improving, any staff member with concerns should press the Designated Safeguarding Lead (DSL) for re-consideration.
- If a member of staff remains concerned about a child, they can discuss their concerns with the headteacher or another DSL; contact the Children and Families Front Door on 01926 414144 or via triagehub@warwickshire.gov.uk; or the Front Door Education Lead on 01926 418608 or via MASHeducationlead@warwickshire.gov.uk for additional advice as necessary.
- Pupils and staff involved in child protection issues will receive appropriate support.
- This policy will be reviewed at least annually unless an incident, new legislation or guidance suggests the need for an interim review. Representatives of the whole school community of pupils, parents, staff, volunteers and governors will be involved in reviewing, shaping and developing the school's safeguarding arrangements and child protection policy.

Policy aims:

- To provide all staff (see definition below) with the necessary information to enable them to meet their safeguarding and child protection responsibilities.
- To ensure consistent good practice.
- To inform pupils, parents and other stakeholders (e.g. partner agencies) about the school's arrangements for safeguarding pupils.
- To demonstrate the school's commitment with regard to safeguarding and child protection to pupils, parents and other partners.
- To contribute to the school's safeguarding portfolio.

2. Safeguarding legislation and guidance

Academies, free schools, independent schools, alternative providers of education - Section 157 of the Education Act 2002 and the Education (Independent School Standards)

Regulations 2014 require proprietors of independent schools (including academies and city technology colleges) to have arrangements to safeguard and promote the welfare of children who are pupils at the school.

- The **Teachers' Standards 2012** state that teachers, including headteachers, must have regard for the need to safeguard pupils' well-being, in accordance with statutory provisions; and uphold public trust in the teaching profession as part of their professional duties.
- The statutory guidance **Working Together to Safeguard Children (DfE 2023)** covers the legislative requirements and expectations of individual services (including schools and colleges) to safeguard and promote the welfare of children. It also provides the framework for the three local safeguarding partners (the local authority; a clinical commissioning group for an area, any part of which falls within the local authority; and the chief officer of Police for a Police area, any part of which falls within the local authority area) to make arrangements to work together to safeguard and promote the welfare of local children including identifying and responding to their needs. The guidance confirms that it applies, in its entirety, to all schools.

- The statutory guidance **Keeping Children Safe in Education (KCSiE) DfE 2025)** is

issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014 and the Non-Maintained Special Schools (England) Regulations 2015. Schools and colleges must have regard to this guidance when carrying out their duties to safeguard and promote the welfare of children. Unless otherwise stated, 'school' in this guidance means all schools, whether maintained, non-maintained or independent, including academies and free schools, alternative provision academies, maintained nursery schools and pupil referral units. 'College' means further education colleges and sixth form colleges as established under the Further and Higher Education Act 1992, institutions designated as being within the further education sector under section 28 of the Further and Higher Education Act 1992 and providers of post 16 Education as set out in the Education and Training (Welfare of Children) Act 2021: 16-19 Academies, Special Post-16 institutions and Independent Training Providers.

For colleges, **Keeping Children Safe in Education** relates to their responsibilities towards children who are receiving education or training at these institutions.

Keeping Children Safe in Education 2025 highlights it is essential that **everybody** working in a school or college understands their safeguarding responsibilities. **All** staff who work directly with children must read Part One, Part Five and Annex B of KCSiE.

Staff can find a copy of **Keeping Children Safe in Education 2025** in the school staffroom. As required by KCSiE 2025, the governing/proprietor body will assist staff to understand and discharge their role and responsibilities as set out in the parts of KCSiE they are required to read by regular training and through the use of quizzes and questionnaires.

- **What to do if you're worried a child is being abused 2015 - Advice for practitioners** is non-statutory advice which helps practitioners (everyone who works with children) to identify abuse, exploitation and neglect and take appropriate action – please see Child abuse concerns: guide for practitioners - GOV.UK (www.gov.uk)

Terminology

Safeguarding and promoting the welfare of children is defined in Working Together to Safeguard Children as:

• providing help and support to meet the needs of children as soon as problems emerge;
• protecting children from maltreatment, whether that is within our outside the home, including online;
• preventing the impairment of children's mental and physical health or development;
• ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
• promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children; and
• taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework

Child protection refers to the processes undertaken to protect children who have been identified as suffering or are likely to suffer significant harm.

Significant harm is defined in section 31 of the Children Act 1989 as follows:
• "harm" means ill-treatment or the impairment of health or development
• "development" means physical, intellectual, emotional, social or behavioural development
• "health" means physical or mental health
• "ill-treatment" includes sexual abuse and forms of ill-treatment which are not physical.

Staff refers to all those working for or on behalf of the school, full-time or part-time, temporary or permanent, in either a paid or voluntary capacity.

Child/children includes everyone under the age of 18.

Parent refers to birth parents and other adults who are in a parenting role, for example stepparents, foster carers and adoptive parents.

3. Roles and responsibilities

Key personnel

The Designated Safeguarding Lead (DSL) is Tracey Gillin

Contact details: email:head2035@we-learn.com Tel: 0247392877

Contact details:

Tel: 02476392877

Siana Woodward: neal.s2@welearn365.com

Martyne Atkins: varden.m1@welearn365.com

Patricia Finelli-Calder: finelli-calder.p@welearn365.com

Early Help Lead is Siana Woodward

The nominated safeguarding governor is Jim Crawford

Contact details: email: admin2035@welearn365.com Tel: 02476392877

The Head of School is Tracey Gillin

All schools are required to appoint a member of the senior leadership team to co-ordinate child protection arrangements and to ensure that there are appropriate cover arrangements.

The Designated Safeguarding Lead (DSL):

- is a senior member of staff from the school's leadership team and therefore has the status and authority within the school to carry out the duties of the post, including committing resources and supporting and directing other staff.
- takes lead responsibility for safeguarding and child protection (including online safety) in the school, which will not be delegated although the activities of the DSL may be delegated to appropriately trained deputies. The role and responsibility are explicit in the role holder's job description.
- is appropriately trained (including Prevent and online safety training), receives refresher training at two-yearly intervals and regularly (at least annually) updates their knowledge and skills to keep up with any developments relevant to their role.
- acts as a source of advice, support and expertise to the school community.
- encourages a culture of listening to children and taking account of their wishes and feelings.
- is alert to the specific needs of children in need; those with special educational and mental health needs; children who are looked after or were previously looked after; children who have a social worker; and young carers, overseeing the provision of

effective pastoral support to all of those children and promoting their educational outcomes by sharing information about their welfare, circumstances and needs with teachers and other staff as appropriate.

- works closely with pastoral support staff; the SENCo; the designated teacher for children who are looked after or were previously looked after; staff with designated responsibility for promoting children's mental health and emotional wellbeing; the ICT lead and any ICT support staff; and school nurses in relation to safeguarding matters (including online and digital safety) and deciding whether to make referrals to relevant partner agencies.
- has a working knowledge of locally agreed multi-agency safeguarding arrangements and procedures put in place by Warwickshire Safeguarding.
- has an understanding of the early help process to ensure effective support, assessment and understanding of children's additional needs in order to inform appropriate provision of early help and intervention.
- keeps detailed and accurate written records of all concerns, ensuring that such records are stored securely and flagged; but kept separate from the pupil's general file.
- refers cases of suspected abuse to Children's Social Care or the Police as appropriate; and, where a crime may have been committed, refers cases to the Police.
- refers cases using the prescribed pro forma to Children's Social Care and the Prevent policing team for a joint assessment where there is a concern that a child is at risk of radicalisation; and to the Channel panel if subsequently advised to do so.
- ensures that staff do everything they can to support social workers and contribute to assessments of children when Children's Social Care become involved.
- notifies Children's Social Care if a child with a child protection plan is absent without explanation at intervals as defined in the plan.
- ensures that, when a pupil under the age of 18 years leaves the school, their child protection file is transferred to the new school/ education provider (separately from the main pupil file and ensuring secure transit) and confirmation of receipt is obtained. If the child is the subject of an open case to Children's Social Care, the pupil's social worker will also be informed.
- considers whether to share any information about a child leaving the school with the receiving school/college/education provider in advance so that the receiving setting is appropriately informed in order to support the child as effectively as possible and plan for her/his arrival.
- attends and/or contributes to child protection conferences, strategy meetings and multi-agency exploitation meetings.
- co-ordinates the school's contribution to child protection plans as part of core groups, attending and actively participating in core group meetings.
- develops effective links with relevant statutory and voluntary agencies including the local SP.
- ensures that all staff sign to indicate that they have read and understand the child protection policy; the online safety policy; the staff behaviour policy (code of conduct); the behaviour policy; the school's safeguarding response to children who go missing from education; the role of the DSL (including the identity of the DSL and any deputies); and Part 1 of Keeping Children Safe in Education 2025 (and also Part 5 and Annex B in relation to staff who work directly with children)
- ensures that all staff understand that if they have **any concerns** about a child's welfare, they should act on them immediately, either by speaking to the DSL (or a deputy) or, in exceptional circumstances, taking responsibility to make a referral to Children's Social Care.
- ensures that all staff make a full record of **any** safeguarding concerns using CPOMS/Green Forms
- ensures that all staff know how to make a referral as in sections 30-32 of this policy.
- has a working knowledge of relevant national guidance in respect of all specific safeguarding issues highlighted in paragraphs 31-48 (pages 11-15) and Annex B (pages 149-170) of Keeping Children Safe in Education 2025, ensuring that all staff receive regular updated safeguarding training including online safety training.
- understands the unique risks associated with online safety - including the emerging risks associated with artificial intelligence (AI) -and ensures that staff are

trained to have the requisite knowledge and up to date capability to keep children safe whilst they are online.

- understands the relevance of data protection legislation and regulations, especially the Data Protection Act 2018 and General Data Protection Regulation (GDPR) in respect of safeguarding children.
- ensures that the child protection policy and procedures are reviewed and updated at least annually, working with the whole school community of pupils, parents, staff, volunteers and governors and/or proprietors regarding this.
- liaises with the nominated governor as appropriate.
- ensures that all members of the senior leadership team read Keeping Children Safe in Education 2024, as specified on page 4 of that guidance.
- Ensuring that all relevant staff are aware of the requirement for children to be accompanied by an Appropriate Adult should they need to be interviewed by the Police (please refer to PACE Code C 2019 (accessible) - GOV.UK (www.gov.uk).
- keeps a record of staff attendance at child protection training.
- makes the child protection policy available publicly, i.e. on the school's website or by other means.
- ensures parents are aware of the school's role in safeguarding and that referrals about suspected abuse and neglect may be made.
- ensures that the school holds more than one emergency contact number for every pupil/student.

The Deputy Designated Safeguarding Lead(s)

is appropriately trained (including Prevent and online safety training) to the same standard as the DSL and supports the DSL with safeguarding matters as appropriate. In the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of pupils. The role and responsibility are explicit in all role holders' job descriptions. In the event of the long-term absence of the DSL, the deputy will assume all the functions of the DSL as above.

The Governing Body

- Has a strategic leadership responsibility for the school's safeguarding arrangements; **must** comply with its duties as defined in statutory guidance Keeping Children Safe in Education (DfE 2025); and **must** have regard to that guidance, ensuring policies, procedures and training in the school are effective and comply with the law including the Human Rights Act 1998 and the Equality Act 2010 (including the Public Sector Equality Duty) at all times.
- Facilitates a whole school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development; and that ultimately, all systems, processes and policies operate with the best interests of children at their heart.
- Ensures that systems which are well promoted, easily understood and easily accessible for pupils are in place for them to report abuse confidently, knowing that their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
- appoints a Designated Safeguarding Lead who is a senior member of staff from the school leadership team and who has undertaken training in inter-agency working, in addition to basic child protection training.
- ensures that the DSL role is explicit in the role holder's job description (and also the job description of any Deputy Designated Safeguarding Leads) and that safeguarding responsibilities are identified explicitly in the job/role descriptions of every member of staff and volunteer.
- ensures that the school has policies and procedures in place in order to safeguard and promote children's welfare. Those policies include an effective child protection policy; a behaviour policy which includes measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying); a staff behaviour (code of conduct) policy and appropriate safeguarding arrangements to respond to children who go missing from

education, particularly on repeat occasions; and that all of those policies are consistent with local and statutory requirements, reviewed annually and made available publicly on the school's website or by other means.

- ensures that the child protection policy reflects the whole school approach to child on child abuse, describes procedures in accordance with government guidance and refers to locally agreed multi-agency safeguarding arrangements put in place by the SP.
- ensures the child protection policy is reviewed at least annually and updated if needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt; and is available publicly either via the school or college website or by other means.
- develops an induction strategy that ensures all staff, including the headteacher, temporary staff and volunteers, are provided with copies of or access to Part one of KCSiE (or Annex A, if appropriate), this child protection policy, the behaviour policy, the staff behaviour (code of conduct) policy, the safeguarding response to children who go missing from education and the role and identity of the DSL and deputy DSL's as part of their induction before they start work at the school.
- ensures that the DSL or a Deputy DSL is always available during school or college hours for staff to discuss any safeguarding concerns. The DSL or a Deputy DSL will generally be expected to be available in person but in exceptional circumstances availability will be via telephone and/or Microsoft Teams/ZOOM/Skype or other such media.
- ensures that the DSL or a Deputy DSL is always available at least via telephone or other media as above during any out of hours/out of term school activities; and that staff are aware that in the unlikely event of the DSL and all deputy DSL's not being available, they should speak to a member of SLT and/or take advice from local Children's Social Care if they are concerned about a child's safety.
- ensures that child protection files are maintained as set out in Annex C of Keeping Children Safe in Education 2025.
- ensures that the school follows safer recruitment procedures and maintains the single central record in accordance with Part 3 of Keeping Children Safe in Education 2025
- ensures that the school has procedures for dealing with allegations of abuse made against and 'low level concerns' about the conduct of staff and volunteers (encompassing any breach of the staff behaviour policy); including allegations made against and 'low level concerns' about the conduct of the headteacher.
- develops a training strategy that ensures all staff, including the headteacher, temporary staff and volunteers, receive appropriate and regularly updated safeguarding and child protection training (including online safety) and updates as required (at least annually) to provide them with the relevant skills and knowledge to safeguard children effectively in line with any requirements of the SP. The training strategy will also ensure that the DSL receives refresher training and regular updates as defined under the DSL's duties above.
- appoints a designated teacher to promote the educational achievement of children who are looked after by the Local Authority and who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales; and ensures that the designated teacher has appropriate training.
- ensures that the DSL has contact details for and liaises with the Virtual Headteacher in the local authority as part of promoting the education of children who are looked after, were previously looked after and/or have a social worker.
- ensures that the school contributes to inter-agency working and plans.
- ensures that the school provides effective pastoral care and participates in the Early Help Pathway process for pupils/students with additional needs in order to provide a co-ordinated offer of early help.
- ensures that pupils are taught about safeguarding including child on child abuse; grooming; online safety including risks linked to artificial intelligence; how to identify risk; how to get help when they need it; and other topics as specified in paragraphs 128-139 of Keeping Children Safe in Education 2025; and that children with particular needs such as those who are known to be vulnerable, those who have experienced abuse or neglect and those with SEN/D are provided with an appropriately customised safeguarding curriculum.

- as part of ensuring staff undergo regular updated safeguarding training and children are taught about safeguarding, ensures that safeguarding training for staff (including online safety) and the safeguarding curriculum (including online safety) is integrated, aligned and considered as part of the whole school's safeguarding approach and wider staff training and curriculum planning.
- ensures that all governors receive mandatory safeguarding and child protection (including online) training at induction which equips them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in school are effective and support the delivery of a robust whole school approach to safeguarding. Their training will be updated regularly.
- nominates a member (normally the chair) to be responsible for liaising with the Local Authority and other agencies in the event of an allegation being made against the headteacher.
- identifies a named governor to take leadership responsibility for the school's safeguarding arrangements. That governor will maintain regular contact with the DSL and will ensure that the governing body receives regular reports about safeguarding activity at the school.
- ensures that the school's safeguarding, recruitment and allegations management procedures take into account the procedures and practice of the Local Authority, local safeguarding partnership and national guidance.

  The school will submit a response to the SP's annual schools' safeguarding audit. This will highlight how the governing/proprietor body's duties have been carried out. An action plan will be drawn up and any weaknesses will be rectified in accordance with that plan.

The Principal:

- ensures that the child protection policy and procedures are understood and implemented by all staff.
- allocates sufficient time, training, support and resources, including cover arrangements when necessary, to enable the DSL and deputy/s to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings.
- supports the designated teacher for looked after children to promote the educational achievement of any pupils who are looked after by the Local Authority and who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.
- ensures that all staff have the skills, knowledge and understanding necessary to keep looked after children, previously looked after children and children with a social worker safe.
- ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistleblowing procedure.
- ensures that the culture of the school supports the provision of effective pastoral care and early help.
- ensures that staff do everything they can to support social workers when Children's Social Care become involved.
- ensures that pupils are taught about safeguarding including child on child abuse; grooming; online safety including risks associated with artificial intelligence; how to identify risk; how to get help when they need it; and other topics as specified in paragraphs 128-139 of Keeping Children Safe in Education 2025 as part of a broad and balanced curriculum; and that children with particular needs such as those who are known to be vulnerable, those who have experienced abuse or neglect and those with SEN/D are provided with an appropriately customised safeguarding curriculum.
- refers all allegations that a child has been harmed by or that children may be at risk of harm from a member of staff or volunteer to the Local Authority Designated Officer

(LADO) in the Local Authority within one working day prior to any internal investigation.
- ensures that anyone who has harmed or may pose a risk of harm to a child is referred to the Disclosure and Barring Service, as advised by the LADO.
- appoints a case officer who will be a member of the senior leadership team to investigate allegations concerning members of staff and volunteers and/or act as a point of contact for the member of staff/volunteer against whom the allegation is made.
- responds to all 'low level concerns' about the conduct of staff and volunteers (encompassing any breach of the staff behaviour policy) in a timely and proportionate manner, taking advice from the LADO and the school's HR provider as appropriate.

4. Good practice guidelines and staff code of conduct

To meet and maintain our responsibilities towards pupils, we identify standards of good practice and set out our expectations of staff in the staff behaviour (code of conduct) policy, which all members of staff and volunteers are required to read and sign before starting work in the school. In summary, our expectations of staff include:

- treating all pupils with respect;
- setting a good example by conducting themselves appropriately;
- involving pupils in decisions that affect them;
- encouraging positive, respectful and safe behaviour among pupils;
- being a good listener;
- being alert to changes in pupils' behaviour and to signs of abuse, neglect and exploitation;
- recognising that challenging behaviour and mental health difficulties may be an indicator of abuse;
- reading and understanding the school's child protection policy, staff behaviour (code of conduct) policy and guidance documents on wider safeguarding issues, for example bullying, behaviour, physical contact, criminal and sexual exploitation, extremism, online safety and information-sharing;
- asking the pupil's permission before initiating legitimate physical contact, such as assisting with dressing, physical support during PE or administering first aid;
- applying the use of reasonable force and physical intervention only as a last resort and in compliance with school procedures and SP guidance;
- maintaining appropriate standards of conversation and interaction with and between pupils and avoiding the use of sexualised or derogatory language;
- not participating in, tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys";
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- challenging behaviours (potentially criminal in nature) which constitute sexual harassment, such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts;
- being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse;
- referring all concerns about a pupil's safety and welfare to the DSL or, if necessary, directly to the Police or Children's Social Care;
- following the school's rules regarding communication and relationships with pupils, including via social media; and
- referring all allegations against members of staff, volunteers or other adults that work with children and any concerns about staff conduct which breaches the Staff Behaviour (code of conduct) policy directly to the headteacher; and any similar allegations against or concerns about the headteacher directly to the chair of governors.

5. Abuse of position of trust

All school staff are aware that inappropriate behaviour towards pupils is unacceptable and

that their conduct towards pupils must be beyond reproach.

6. Children who may be particularly vulnerable

Some children are more vulnerable to abuse and neglect than others. Several factors may contribute to that increased vulnerability, including prejudice and discrimination; isolation; social exclusion; communication issues; a reluctance on the part of some adults to accept that abuse can occur; as well as an individual child's personality, behaviour, disability, mental and physical health needs and family circumstances.

To ensure that all our pupils receive equal protection, we will give special consideration to children who:

- have a disability, educational needs, mental health needs or certain medical or physical health conditions
- do not have English as a first language

and who are:

- young carers
- affected by parental substance misuse, domestic abuse and violence or parental mental health needs
- asylum seekers
- looked after by the Local Authority, otherwise living away from home or were previously looked after
- in receipt of support and services from a social worker
- vulnerable to being bullied, or engaging in bullying behaviours
- living away from home or in temporary accommodation
- living transient lifestyles
- living in chaotic and unsupportive home situations
- missing education
- vulnerable to discrimination and maltreatment on the grounds of race, gender, ethnicity, religion, disability or sexuality (N.B. children who regard themselves or are perceived by other children as lesbian, gay, bi, trans or non-binary can be targeted by other children)
- at risk of child sexual exploitation (CSE) and/or child criminal exploitation
- at risk from or are involved with serious violent crime
- at risk of female genital mutilation (FGM)
- at risk of forced marriage
- at risk of being drawn into extremism.

This list provides examples of additionally vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for children and parents/carers with communication needs.

7. Children with special educational needs, disabilities or physical health issues

Children with special educational needs and/or disabilities (SEND) or certain health conditions are more vulnerable to abuse and neglect and can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect experienced by this group of children, which can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's special needs, disability or condition without further exploration;

- the potential for children with SEND or certain medical conditions being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children, possibly without outwardly showing any signs; and

- communication barriers and difficulties for children overcoming those barriers to report their experiences.

At St. Anne's Catholic Academy, we provide extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place, by

- ensuring that the additional vulnerabilities of the group are highlighted in the annual safeguarding training for staff so that staff are alert to the particular problems which maybe encountered
- promoting a culture of vigilance within the team of teaching assistance and SEND support teachers who are likely to be working most closely with the highly vulnerable groups and be in the best position to identify issues at an early stage
- including the SENDCo in the safeguarding team and making sure the SENDCo's DSL training is kept up to date
- having an open-door approach so that all staff feel they can approach the SENDCo or members of the SEND team to share concerns
- promoting close links with families of children with SEND through annual reviews and other meetings, with efforts made to establish those links on admission to the school and maintain them through regular contact.
- close working relationships between the SENDCO and other key staff in school such as the pastoral teams and the administration staff overseeing individual health care plans
- working closely with external agencies to share information and be part of regular reviews and monitoring visits for children who are not being educated on site
- developing provision for each pupil with SEND which meets learning needs and has regard for social, emotional and mental health All staff are trained to manage these additional barriers to ensure this group of children are appropriately safeguarded.

All staff are trained to manage these additional barriers to ensure this group of children are appropriately safeguarded.

8. Children with mental health needs

All staff are trained to be aware that mental health problems can, in some cases, be an indicator that a child has suffered, is suffering or is at risk of suffering abuse, neglect or exploitation. However, staff are not expected or trained to diagnose mental health conditions or issues but they will record and report any concerns about a child's mental health to the Designated Safeguarding Lead as with any other safeguarding concern.

Where children have suffered abuse, neglect or other potentially traumatic adverse childhood experiences including exploitation and child on child abuse, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are trained to be aware of how such experiences can impact children's mental health, behaviour, and education. Children who are experiencing mental health problems are also more likely to experience isolation and to miss education, which can render them vulnerable to abuse including child on child abuse (online and face to face), grooming, exploitation and radicalisation.

The senior lead for mental health at this school is Patti Finelli-Calder

9. Early Help and use of the Early Support Assessment – Pathway to Change

Keeping Children Safe in Education 2025 highlights that school staff are uniquely placed to identify concerns about children early, help them, promote their welfare and prevent

concerns from escalating.

The school recognises that providing timely pastoral support and early help is more effective in promoting the welfare of children than reacting later. Early help means providing support as soon as a problem emerges, at any point in a child's life. Keeping Children Safe in Education 2025 emphasises that **all** staff should be aware of the early help process and understand their role in it. All school staff are therefore trained and required to notice any concerns about children which may help to identify that they would benefit from early help; to record those concerns using CPOMS/green forms see section 24 below); and to share their concerns with the Designated Safeguarding Lead (or a Deputy DSL), who is most likely to have a complete picture and be the most appropriate person to decide how best to respond to any concerns.

The school is committed to working in partnership with children, parents and other agencies to:

- identify situations in which children and/or their families would benefit from early help;
- undertake an assessment of the need for early help when that is appropriate, using the Early Support Assessment Pathway to Change, Child and Family Plan, Family Agreement and Family Assessment tools and processes as appropriate; and
- provide targeted early help services to address the assessed needs of a child and their family, developing an action plan that will focus on activity to improve the child's outcomes.

Whilst recognising that any child may need early help at any time, the school will be particularly alert to the potential need for early help for any child who:

- is disabled; or has certain health conditions with specific additional needs;
- has special educational needs (whether or not the child has a statutory education, health and care plan);
- is a young carer;
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from education, home or care; including persistent absences for part of the school day and inadequate explanations for absence
- has experienced multiple suspensions; is at risk of being perminatly excluded from school; or attends alternative provision or a pupil referral unit;
- is at risk of modern slavery, trafficking or exploitation;
- is in a family whose circumstances present challenges for the child, such as drug/alcohol abuse, adult mental health issues or domestic abuse;
- is misusing drugs or alcohol themselves;
- has a family member in custody, or is affected by parental offending;
- has returned home to their family from care;
- is at risk of 'honour' based abuse such as Female Genital Mutilation or Forced Marriage;
- is at risk of being radicalised;
- is a privately fostered child;
- is persistently absent from education, including persistent absences for part of the school day;
- is showing early signs of abuse, exploitation and/or neglect; and/or
- is particularly vulnerable in any of the ways identified in section 6 above.

Early help might best be provided by simple pastoral support and may be something the school is able to address with parents/carers or the child her/himself so that the child's needs are met quickly and easily. Early help can only be provided with the express consent of parents/carers. The school will keep a record of any such help to record clear targets, actions for all parties including parents/carers and progress, using the Early Support Pathway to Change resources as above as appropriate (please see https://www.warwickshire.gov.uk/children-families/early-help-warwickshire).

https://api.warwickshire.gov.uk/documents/WCCC-640-1948).

In some circumstances, it may become necessary to take some time with parents/carers to understand their child's needs and circumstances in a more structured way. Children and families may also need support from a range of local agencies beyond the school. Where the school has identified that a structured assessment would benefit a child in order to determine how best to meet their needs and support their family; or where a child and family would benefit from co-ordinated support from more than one agency (e.g. education, health, housing, Police) and with the parents/carers' express consent, the school will use the Early Help Pathway to Change process to identify what help the child and family require.

The Early Support Pathway to Change process is a restorative approach. The school is committed to working **in partnership** with families to address children's needs positively and proactively. By means of a co-ordinated assessment undertaken by families and practitioners working **with** them, the Pathway to Change process is designed to help identify what support a family requires in order to prevent their child's needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989.

N.B. If the family only require information or advice, that can be accessed via the local authority's Family Information Service on 01926 742274. Helpful support may also be available from the Early Help Family Support Line on 01926 412412.

The Designated Safeguarding Lead (or Deputy DSL) will generally lead on liaising with other agencies and setting up the Early Help Pathway to Change process but other staff may be required to work directly with pupils and their families and to support other agencies and practitioners in the process, in some cases acting as the lead professional.

As specified in Keeping Children Safe in Education 2025, the Designated Safeguarding Lead will keep the needs and circumstances of children receiving early help under constant review. If the child's situation does not improve or is getting worse; and/or the child's parents and/or the child do not consent to early help, the school will make a judgement about whether, without help, the needs of the child are likely to escalate. If so, the school will seek further advice from early help services as above or will contact the Children and Families Front Door to discuss whether a referral to Children's Social Care is appropriate.

N.B it is important to highlight that the Early Support Pathway to Change process can only be effective if it is undertaken with the agreement and participation of the child's parents/carers as well as all the practitioners who are working with them. Young people in secondary schools or FE colleges may consent to early help, possibly including an Early Help Pathway to Change process, in their own right, subject to *Information sharing - Advice for practitioners providing safeguarding services for children, young people, parents and carers (HMG 2024).* The school will seek advice from a Targeted Support Officer or the Children and Families Front Door Education Lead in those circumstances.

10. Attendance

We recognise that full attendance at school is important to the well-being of all our pupils and enables them to access the opportunities made available to them at school. Attendance is monitored closely and we address poor or irregular attendance without delay, working in partnership with the Warwickshire Attendance Service when patterns of absence give rise to concern. Our attendance policy is set out in a separate document and is reviewed regularly by the governing body.

11. Children who are absent from school or missing from Education

The school operates in accordance with statutory guidance *Working together to improve school attendance* (DfE 2024) -
Working together to improve school attendance

and additional guidance *Children Missing Education (DfE 2024)* -
Children Missing Education - Guidance for Local authorities

All children, regardless of their circumstances, are entitled to an efficient, full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have.

The school recognises and staff are trained to understand that a child who is absent from school at the start or at any time of the school day, particularly for prolonged periods and/or on repeat occasions, can act as a vital warning sign to a range of safeguarding issues including neglect; physical and/or sexual abuse; child sexual and/or criminal exploitation (particularly county lines); mental health problems; risk of substance abuse; risk of honour based abuse including female genital mutilation and forced marriage; and risk of travelling to conflict zones.

This includes when problems first emerge; but also being absent or going missing from education may increase known safeguarding risks within the family or in the community for children who are already vulnerable, including those already known to Children's Social Care 20 and/or who need a social worker

Effective information sharing between parents, schools and local authorities is critical to ensuring that all children of compulsory school age are safe and receiving suitable education.

Attendance, absence and exclusions are closely monitored. All staff are informed as part of their induction about the procedure for reporting and taking action when children do not arrive for school and/or do not attend regularly. The DSL will monitor unauthorised absence and take appropriate action including notifying the local authority, particularly where children are absent repeatedly and/or are missing for periods during the school day.

We will always follow up by 10am at the latest with parents/carers when pupils are not at school. This means we need to have at least two up to date emergency contact numbers*, one of which will ideally be for a trusted relative, neighbour or family friend in the event of an emergency that incapacitates a parent/carer to the extent they are unable to make contact with the school or take a call from the school. This will also enable the school to make sure help is provided in a situation where children are at home unsupervised because parents/carers are unwell; or there is a serious incident on the way to school. Parents are therefore asked to update the school as soon as possible if their nominated emergency contact numbers change.

*emergency contact numbers are also essential for the school to safeguard the child in the instance of them being uncollected by a parent, carer or other responsible adult nominated by a parent/carer at the end of the school day. In order to safeguard their child, it is also therefore essential that parents/carers update the school promptly about any changes in household composition and particularly responsible adults who parents/carers nominate to collect their child. Where children are not collected as expected, we will, telephone parents/carers and other emergency contact numbers provided by parents 15 minutes after the end of the school day.

In order to reduce the risk of children missing education, we follow the DfE legal

requirements for schools in respect of recording and reporting of children who leave school without any known destination.

Where a pupil has 10 consecutive school days of unexplained absence without permission and all reasonable steps* have been taken by the school to establish their whereabouts without success, the school will make an immediate referral to Warwickshire County Council's Children Missing Education team on 01926 736323 or via Email to cme@warwickshire.gov.uk. The referral form can also be accessed via https://www.warwickshire.gov.uk/childrenmissingeducation

*Reasonable steps include:

- Telephone calls to all known contacts. Parents are asked to provide a minimum of two emergency contacts in the event of children not arriving at school without prior notification and also for other emergency purposes;
- Letters home (including recorded delivery);
- Contact with other schools where siblings may be registered;
- Home visits where safe to do so;
- Enquiries to friends, neighbours etc. through school contacts;
- Enquiries with any other service known to be involved with the pupil/family;
- Consideration of information about the child in social media;

All contacts and outcomes will be recorded on the pupil's file.

The school is required by law to have an admission register and, with the exception of schools where all pupils are boarders, an attendance register. All pupils must be placed on both registers.

The school (including academies and independent schools) is required to inform the Local Authority when they are about to remove a pupil's name from the school admission register at non-standard transition points irrespective of the reason. The Local Authority may also require the school to provide information about pupils who are going to be removed from the register at standard transition points.

We will inform the local authority that we plan to take a child off roll when they leave school to be home educated; move away from the school's location; remain medically unfit beyond compulsory school age; are in custody for four months or more (and will not return to school afterwards); or are permanently excluded.

The school will also notify the local authority within five days of adding a pupil's name to the admission register at a non-standard transition point. The Local Authority may also require the school to provide information about pupils added to the register at a standard transition point.

It is essential for the school to comply with this duty so that the Local Authority can, as part of its duty to identify children of compulsory school age who are missing education, follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

Upon receipt of a CME referral from the school, the Local Authority and the school will work jointly to attempt to track the child, for at least a further 10 school days, using access to additional contacts/services, e.g. the Children and Families Integrated Front Door, Health services, Housing services. If this also fails to establish the pupil's whereabouts, the school will be informed by email and may then, but not before, remove the pupil from roll and place the child's name on the School to School database, entering XXXXXXX in the box for destination. This will place the pupil on the list of Children Missing from Education and the details will be entered onto the Department for Education (DfE) national database.

Deletions from roll agreed with the Local Authority will normally be backdated to the first day of absence.

If the Local Authority is able to contact the pupil and her/his parents, arrangements will be made with the school and family for a return to education, including a re-integration programme where necessary. If the pupil has registered at another school, the school will delete the child's name from our roll and transfer the child's educational records to the new school in the normal way. Any child protection records will be transferred separately and securely for the attention of the DSL in the new school and a receipt secured.

Pupils leaving the school for known destinations outside the maintained sector in England and Wales will be updated to the School to School database using MMMMMMM in the destination box. This includes private/independent schools, schools in other countries (including Scotland and Northern Ireland) and pupils moving into Elective Home Education. The latter will be formally notified to the Children Missing Education team by the school as soon as written confirmation is received from the parent(s).

Where a parent/carer has expressed their intention to remove a child from the school with a view to educating her/him at home, the school will work with the local authority and other key professionals to arrange a meeting with parents/carers where possible. Where possible, this will be before a final decision has been made to ensure the child's parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

If no confirmation is received the above Children Missing Education procedures will apply. We will ensure that pupils who are expected to attend the school but fail to take up the place are referred to the Local Authority. When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

In accordance with *Working together to improve school attendance*, the school will work in in partnership with Children's Services where a child's absence from school indicates a safeguarding concern.

12. Children who run away or go missing from home or care

The school recognises that children who run away or go missing (particularly repeatedly) and are thus absent from their normal residence are potentially vulnerable to abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It could also indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage.

Statutory Guidance on Children who Run Away or go Missing from Home or Care' (DfE 2014) requires that every child or young person who runs away or goes missing must be offered a Return Home Interview (RHI) within a period of 72 hours of their return.

RHI's are intended to ascertain the factors that triggered the young person's absence. Those factors may include difficulties at home, in school and in the community. The short timescale of 72 hours is imposed in order to ensure that the RHI remains relevant to the young person and enables any required action to be initiated at the earliest opportunity.

RHI's are undertaken by practitioners who are independent in order to facilitate a discussion with the young person that is as open as possible. As soon as the Local Authority receives notification that a young person has gone missing from home or care, a letter will be sent to parents/carers seeking their consent to an RHI with their son/daughter. Direct contact will

then be made with parents/carers and the young person to make arrangements for the interview.

In order to fulfil the timescale of within 72 hours, it is essential that all opportunities to interview young people including times during the school day are utilised.

When necessary and in conjunction with the Local Authority, the school will facilitate Return Home Interviews, both in terms of releasing the young person from their normal timetable to participate in an interview and in providing an appropriate and safe space on the school site for the interview to take place.

The school will check with the Local Authority whether or not parents/carers have given their consent to the interview. However, young people aged 16 and 17 years old are generally considered to be able to consent and withhold consent to their own information being shared and therefore to participate in an RHI or not. With reference to Gillick competency guidelines, younger children may also be deemed able to consent.

If the Local Authority has not received consent from parents/carers and the young person is not assessed as being capable of giving or withholding informed consent, the school will contact the parent/carer and seek to secure their consent.

Parents/carers may also choose to accompany their son/daughter in interviews and the school will facilitate that as appropriate.

13. Helping children to understand and recognise risk, identify available support and report abuse

As part of a whole school approach to safeguarding, Keeping Children Safe in Education 2025 requires governing bodies and proprietors to "ensure that children are taught about how to keep themselves and others safe, including online". The school recognises that a one size fits all approach may not be appropriate for all pupils; and that a more personalised or contextualised approach for some vulnerable children, victims of abuse and children with SEND might be needed.

Governing bodies and proprietors are also required to ensure that there are systems in place that are "well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously."

Children are taught to understand and manage risk through the age-appropriate personal, social, health and economic (PSHE) programme; online safety curriculum; sex and relationships lessons; and through all aspects of school life. Our approach is designed to help children to think about risks they may encounter (including risks from other children, both in and out of school), recognise when they are at risk and with the support of staff work out how to get help when they need it and how risks might be reduced or managed. Discussions about risk are empowering and enabling for all children and promote sensible behaviour rather than fear or anxiety. Children are taught how to conduct themselves and how to behave in a responsible manner. Children are taught and reminded regularly about online safety, the risks of sharing content and images online, grooming (both online and face to face)risks associated with artificial intelligence (AI) and tackling bullying, including cyber bullying procedures. The school continually promotes an ethos of self-respect, mutual respect and empathy; and pupils are encouraged to speak to a member of staff of their choosing about any worries they may have.

The school's system to support and enable children to report abuse

The school uses a wide range of systems to support and enable children to report abuse. These include I'd like to talk boxes, 'I've got my Early Warning Signs about…' proformas, displays, posters, information on the school website, sharing dedicated safeguarding contact mobile numbers and by giving regular explicit reminders to children by staff about speaking to a trusted adult if they are worried or upset about anything. This will be linked to the work carried out through the Taking Care Programme about Early Warning signs and the helping hand of trusted adults. We have adopted the personal safety programme Taking Care (based on the Protective Behaviours Process) for Foundation/Key Stage 1 and Key Stage 2, which is designed to fit in with the requirements of the PSHE Curriculum. This programme reinforces essential skills for every child. Self-esteem and confidence building, thinking independently and making assessments of risk based on their own judgements are encouraged throughout the course. We have also adopted the Ten Ten Programme 'Life to the Full' to teach children about health and relationships. Children are also taught in an age-appropriate way about online safety; issues of boundaries and consent; stereotyping, prejudice and equality; body confidence and self-esteem; fundamental British values; how children can keep themselves safe from all forms of bullying including online bullying and drugs and alcohol.

14. Bullying, child on child abuse and harmful sexual behaviour

This school believes that all children have a right to attend school and learn in a safe environment. Children should be free from harm, both from adults and other pupils in the school.

Staff are trained and expected to be aware that children can abuse other children (often referred to as child on child abuse); that it can happen both inside and outside of school and online; to recognise the indicators and signs of child on child abuse; and to identify it and respond to reports by pupils about themselves or other children as they would with any other safeguarding issue.

The school recognises that, even if there are no reports of child on child abuse in the school, it does not mean it is not happening. Staff are expected to give pupils every opportunity to talk to them in the event they are experiencing anything causing them harm, distress or worry and to discuss any concerns about child on child abuse (reported and suspected) with the DSL or a deputy DSL.

Keeping Children Safe in Education 2025 states that child on child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse');
- physical abuse which can include 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; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Staff are trained and expected to challenge all such inappropriate behaviours between pupils and not to tolerate, downplay or dismiss any form of child on child abuse as 'banter'; 'just having a laugh'; 'part of growing up'; 'boys being boys'; or 'girls being girls', which the school recognises can lead to a culture of unacceptable behaviours, an unsafe environment for children and, at worst, a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Different gender issues can be prevalent when dealing with child on child abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence. Whilst mindful of the particular vulnerability of women and girls to violence and sexual harassment, it is also recognised that boys as well as girls can be abused by members of the opposite as well as the same gender group.

Bullying is a very serious issue that can cause children considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's well-being and in very rare cases has been a feature in the suicide of some young people.

Staff are expected to address, make a record of and report all incidences of bullying, including cyber-bullying and prejudice-based bullying. All such incidences will be managed through the school's behaviour policy which can be accessed on the school website. All pupils and parents receive a copy of the anti-bullying procedures on joining the school and the subject of bullying is addressed at regular intervals in PSHE education. All members of staff receive a copy of the school's behaviour policy, which contains the anti-bullying procedures, as part of their induction and are trained to be aware of the harm caused by bullying and to respond to all incidents of bullying proactively.

Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected behaviour to inappropriate, problematic, abusive and violent behaviour. Problematic, abusive and violent sexual behaviour is developmentally inappropriate, may cause developmental damage and is referred to as 'Harmful sexual behaviour' (HSB), which can occur online, face to face and also simultaneously between the two.

HSB encompasses a range of behaviour, which can be displayed towards younger children, children of the same age, older children or adults. It is harmful to the children and young people who display it, as well as the people it is directed towards.

HSB will be considered in a child protection context. The ages and stages of development of children are critical factors when considering incidences of HSB. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. For more information about harmful sexual behaviour please refer to: Sexual Behaviour in Children | NSPCC and https://www.brook.org.uk/training/wider-professional-training/sexual-behaviours-traffic-

light-tool/#tlttraining

It is likely that for an allegation or concern to be addressed under child protection procedures, some of the following features will be found. The allegation or concern:

- is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil;
- is of a serious nature, possibly including a criminal offence;
- raises risk factors for other pupils in the school;
- indicates that other pupils may have been affected by this student;
- indicates that young people outside the school may be affected by this student.

The University of Bedfordshire has developed a range of resources to support schools to address harmful sexual behaviour, which can be accessed at:
Beyond Referrals - Schools (csnetwork.org.uk)

Harmful sexual behaviour can, in some cases, progress on a continuum. The school will address inappropriate behaviour as an important early intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Staff understand that children who display harmful sexual behaviour have often experienced their own abuse and trauma; and that it is important they are offered appropriate support.

It is important for the school to consider the wider environmental factors and context within which child on child abuse occurs. Such factors may include the potential for bullying and child on child abuse to take place across a number of social media platforms and services; and for things to move from platform to platform online. The school will also consider the potential for the impact of the incident to extend further than the school's local community (e.g. for images or content to be shared around neighbouring schools/colleges) and for a victim (or alleged perpetrator) to become marginalised and excluded by both online and offline communities. There is also the strong potential for repeat victimisation in the future if abusive content continues to exist somewhere online. Online concerns can be especially complicated. Support is available from **The UK Safer Internet Centre** at 0344 381 4772 and helpline@saferinternet.org.uk and the **Internet Watch Foundation** at https://www.iwf.org.uk/.

N.B. The terms 'victim' and 'perpetrator' are used within this policy because they are widely recognised, understood and helpful in delineating clear safeguarding responses to child on child abuse. However, the school recognises that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in that way. Staff will bear those sensitivities in mind when managing and responding to any individual situation, particularly when speaking in front of children; and will seek always to use terms with which children who have or may have suffered abuse are most comfortable. The school also recognises that abusive behaviour will sometimes be harmful to the 'perpetrator' as well as the 'victim'.

Pupils may report child on child abuse including HSB in respect of other pupils in the school and sometimes young people attending other schools. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. Members of staff to whom such allegations are made should record their concerns in the usual way using CPOMS/ green forms and report them to the DSL as soon as possible, as with any other safeguarding concern.

Child on child sexual violence and sexual harassment

Sexual violence and sexual harassment can occur between two children of any age and sex from primary through to secondary stage and between children of the opposite or the same sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Staff are trained to be aware that although boys can experience sexual violence and sexual

harassment, girls are more likely to be the victims and boys are more likely to cause this kind of harm to others. Some children may be more at risk of specific forms of sexual violence and sexual harassment such as homophobic, biphobic or transphobic bullying.

Children who are lesbian, gay, bi can be targeted by other children, as can a child who is perceived by other children to be LGBT or non-binary (whether they are or not). Staff are trained to be aware of those vulnerabilities, notice any signs that a pupil may be at risk or suffering sexual violence or harassment, reach out to any pupil who may want to talk or need support and report and record those issues as with any other safeguarding concern.

As with all other forms of abuse, staff are trained to understand that children may not find it easy to talk to an adult about an experience of abuse; and may well not make a direct report. That is why it is so important for staff to notice signs of distress, anxiety, changes in presentation and behaviour and reach out to children as above. The school may also find out about possible abuse by a pupil reporting something about another pupil or a member of staff overhearing a conversation that suggests a child has been harmed.

The initial response by a school to a report from a child is incredibly important. The response can either encourage or undermine the confidence of future victims of sexual violence and sexual harassment in the school to report abuse.

Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. As with all other safeguarding issues, staff are trained and expected to maintain an attitude of '**It could happen here**' in relation to the possibility of sexual violence and sexual harassment happening in this school. It is important that **all** victims are taken seriously and offered appropriate support; and that **any** report of sexual violence or sexual harassment is taken seriously.
Children who are victims of sexual violence and sexual harassment, wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school. Safeguarding incidents and/or behaviours can be associated with factors outside the school, including intimate personal relationships, child sexual exploitation and child criminal exploitation.

It is essential that all victims are reassured they are being taken seriously and that they will be supported and kept safe. Staff should never give victims the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children rather than criminalise them. This will be explained to pupils in such a way that avoids alarming or distressing them.

The school will respond to <u>all</u> reports and concerns of child on child sexual violence and sexual harassment, including those that have happened outside of the school premises, and or online. This policy largely refers to sexual violence and sexual harassment between pupils at the school. However, there may be occasions when pupils/students report sexual violence and/or harassment perpetrated by other young people who attend a different educational provision. In that situation, the DSL will liaise with the DSL at the alleged perpetrator's school as well as the victim's parents, the Police and Children's Social Care. Support for the victim will be provided as described below, irrespective of which educational provision the alleged perpetrator attends.

The school recognises the importance of staff understanding the nature of identifying and challenging sexual violence and sexual harassment as part of the school's wider approach to safeguarding and promoting the welfare of children.

What is sexual violence and sexual harassment?

When referring to sexual violence, this policy uses the definitions of sexual offences in the Sexual Offences Act 2003 as follows:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents (NB sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault).

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

What is consent? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape.

Sexual harassment in the context of child on child behaviour is unwanted conduct of a sexual nature that can occur online and offline and both inside and outside of the school Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual 'jokes' or taunting; physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes (NB this may cross a line into sexual violence – the school will listen to the victim and take her/his perspective and experience into account in deciding that); displaying pictures, photos or drawings of a sexual nature; and upskirting (which is a criminal offence).

Online sexual harassment may happen on its own or as part of a wider pattern of sexual harassment and/or sexual violence. It may include consensual and non-consensual sharing of nude and semi-nude images and/or videos; sharing of unwanted explicit content; sexualised online bullying; unwanted sexual comments and messages including via social media; sexual exploitation; coercion and threats; and coercing others into sharing images of themselves or performing acts they're not comfortable with online.

Sexual harassment creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

Minimising the risk of sexual violence and sexual harassment at the school through a planned curriculum

This is addressed through the Protective Behaviour Curriculum, the Ten Ten 'Life to the Full' sex and relationships programme, our mental health and wellbeing programmes, our school behaviour policy and pastoral support systems within the school.

How the school/college will respond to reports of sexual violence and sexual harassment

While it is not possible to anticipate every particular set of circumstances and therefore what the response will be to every case, the school will respond to reports of specific incidents of sexual violence and sexual harassment in accordance with Part 5 of Keeping Children Safe in Education 2025, which all staff who work directly with children are required to read; and other materials highlighted in paragraph 470 and Annex B of that guidance as necessary.

This policy sets out a set of principles which the school will consider in responding on a case by case basis. In the first instance, staff will:

- respond to disclosures of abuse as set out in 'If a pupil discloses abuse or neglect to a member of staff or volunteer' in the child protection procedures section of this policy;
- where there is advance notice of a disclosure, discuss with the pupil whether they would be comfortable for another member of staff (ideally a DSL) to be present, although that may not be possible and the pupil may not consent, which should be respected;
- where the disclosure includes an online element, be aware of advice in respect of searching, screening and confiscation - Sharing nudes and semi-nudes - Advice for education settings working with children and young people - Responding to incidents and safeguarding children and young people' (UK Council for Internet Safety 2024) and Searching, Screening and Confiscation - Advice for schools (DfE 2022) – (see links in next section) – with particular consideration to not viewing or forwarding illegal images of a child. The advice provides more details on what to do when viewing an image is unavoidable. In most cases, it will be more appropriate to confiscate any devices to preserve any evidence and hand them to the DSL (who will take advice about handing to the Police for inspection);
- as with all child protection disclosures, not promising confidentiality as it is very likely a concern will have to be shared further (e.g. with the DSL, Children's Social Care or the Police) to discuss next steps;
- only share the disclosure with those people who are necessary in order to progress it;
- make sure the victim understands what the next steps will be and who the disclosure will be passed to;
- recognise that a child is likely to disclose to someone they trust, which could be any member of staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;
- recognise that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident; and that trauma can impact memory so children may not be able to recall all details or a timeline of abuse;
- keep in mind that certain children may face additional barriers to telling someone because of their vulnerability as described elsewhere in this policy;
- listen carefully to the child, reflect back, use the child's language, remain non-judgmental;

- not ask leading questions and only prompt the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed; what the nature of that harm was; and where and when a reported incident occurred;
- consider the best way to make a record of the disclosure. Best practice is to wait until the end of the conversation with the child and then write a thorough account immediately. This allows the staff member to devote their full attention to the child and listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made, by logging the concern on CPOMS or by completing a green form as with any other safeguarding concern;
- only record facts in terms of what the child tells them and how the child presents to them;
- record professional observations and opinions as such, based only on the facts and the child's presentation (e.g. the child was tearful, the child paused before answering);
- be aware that notes of such reports could become part of a statutory assessment by Children's Social Care and/or part of a criminal investigation; and
- inform the DSL (or deputy DSL) as soon as practically possible if a DSL is not present while the child makes their disclosure.

All responses to disclosures of sexual violence will be subject to an immediate risk and needs assessment undertaken by the DSL (or a deputy), using her/his professional judgement and supported by other agencies, such as Children's Social Care and the Police. The need for a risk and needs assessment in relation to reports of sexual harassment will be considered on a case-by-case basis.

Advice may also be sought from the Children and Families Front Door Education Lead on 01926 418608 or via MASHeducationlead@warwickshire.gov.uk or triagehub@warwickshire.gov.uk.

Risk assessment
The risk and needs assessment will consider:

- the victim, especially their protection and support;
- whether there may be other victims;
- the alleged perpetrator/s; and
- all the other children (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s) or from future harms.
- The time and location of the incident; and any action required to make the location safer for all pupils/students.

The DSL (or a deputy) should ensure they are engaging with Children's Social Care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. The school/college's risk assessment should not replace the detailed assessments of expert professionals. Any such professional assessments will be used to inform the school's approach to supporting and protecting pupils and students and updating its own risk assessment.

The DSL (or a deputy) will maintain an up to date awareness of the local response to sexual violence and sexual harassment by the Police and Children's Social Care including details of what local specialist support is available for all children affected (including victims and alleged perpetrators) by incidents of sexual violence and sexual harassment; and how to

access that support when required.

Action following a report of sexual violence and/or sexual harassment - what to consider

The DSL (or deputy) is likely to have a complete safeguarding picture and will therefore be the most appropriate person to lead the school's initial response. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. However, if the victim asks the school not to tell anyone about the sexual violence or sexual harassment, the DSL (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other children. It is likely to be justified and lawful to share the information if doing so is in the public interest, e.g. to protect the victim and other young people from harm and to promote the welfare of children;
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed;
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- whether the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
- that sexual violence and sexual harassment can take place within intimate personal relationships between children;
- the importance of understanding intra familial harms and any necessary support for siblings following an incident;
- whether there are ongoing risks to the victim, other children, adult students or school/college staff;
- informing parents/carers (unless this would put the victim at greater risk);
- only sharing information with those staff who need to know in order to support the children involved and/or be involved in any investigation. For instance, teachers may be asked to monitor the victim's welfare or ensure a student sits on their own without needing to know that they are a victim or alleged perpetrator of sexual violence or harassment;
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

Considering confidentiality and anonymity

In the event of sexual violence and harassment, it is very likely to be in the child's best interests to seek advice and guidance from others in order to provide support and engage appropriate agencies.

The victim may ask the school not to tell anyone about the sexual violence or sexual harassment, to which there are no easy or definitive answers. If the victim does not consent to their information being shared, it may still be lawfully shared if there is a legitimate purpose for doing so, which includes the need to safeguard children and to detect and prevent criminal offences.

In responding to the victim's request, the DSL will consider the following:

- parents or carers will normally be informed (unless this would put the victim at greater risk);

- if a child is at risk of harm, is in immediate danger, or has been harmed, a referral will be made to Children's Social Care; and
- rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this will be referred to the Police. Whilst the age of criminal responsibility is ten, in the event of the alleged perpetrator being under ten, the starting principle of referring to the Police remains. The Police will take a welfare, rather than a criminal justice approach, in any such cases.

Ultimately, the DSL (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other children. Subject to the risk assessment and whether or not an alleged crime has been committed, the DSL may need to consider issues in relation to Gillick competency and the Fraser guidelines in making a judgement – see https://learning.nspcc.org.uk/child-protection-system/gillick-competence-fraser-guidelines#heading-top

If the DSL (or a deputy) decide to go ahead and make a referral to Children's Social Care and/or a report to the Police against the victim's wishes, this will be handled with extreme care, the reasons will be explained to the victim and appropriate specialist support will be offered.

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, the school will be aware of anonymity, witness support, and the criminal process in general so we can offer support and act appropriately. The school will do all it reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff need to know about it; and any support that can be provided for the children involved. The school will also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

Children sharing a classroom - initial considerations following a report of sexual violence

Any report of sexual violence is likely to be traumatic for the victim. However, reports of rape and assault by penetration are likely to be especially difficult for the victim and close proximity with the alleged perpetrator is likely to be especially distressing. Whilst the school establishes the facts of the case and starts the process of liaising with Children's Social Care and the Police, the alleged perpetrator will be removed from any classes they share with the victim. Careful consideration will also be given to how best to keep the victim and alleged perpetrator a reasonable distance apart on school premises (including during any before or after school-based activities) and on transport to and from the school, where appropriate. These actions are in the best interests of all children involved and should not be perceived to be a judgment on the guilt of the alleged perpetrator(s).

For other reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator and questions regarding shared classes, sharing school premises and transport, will be considered immediately.

In all cases, the wishes of the victim, the nature of the allegations and the protection of all children in the school will be especially important when considering any immediate actions.

Responding to the report/disclosure

Every report will be considered on a case-by-case basis subject to the considerations as above. Responses to all incidents of both sexual violence and sexual harassment will be

underpinned by the principles of:

- zero tolerance of sexual violence and sexual harassment;
- support for both the victim and alleged perpetrator/s, particularly pending the outcome of investigations
- all parties have an ongoing right to an education and are safest if they remain in school subject to appropriate risk assessments and risk management.
- exclusion will be avoided unless that is the only realistic option to keep one or more parties safe.

If an offence has been committed, the Police will be informed. It is the prerogative of parents and victims to make complaints to the Police directly but the school will also speak to the Police in order to ensure effective action is taken to safeguard other young people as well as the victim.

If a child has suffered significant harm, a referral will be made to Children's Social Care via the Children and Families Front Door in order to ensure that the needs of both the victim and perpetrator are the subject of professional risk assessments by social workers. Similarly, any instance of sexual activity between pupils on the school site will always be referred to Children's Social Care.

Informing the alleged perpetrator(s) should be considered carefully. Where the school informs the Police and/or Children's Social Care, the relevant agency will be consulted about how the alleged perpetrator(s) will be informed of the allegations. However, this will not stop the school taking immediate action to safeguard pupils, where required.

In principle, there are four possible responses to an allegation or concern about sexual violence or harassment. Decisions and actions will be reviewed regularly. Where patterns of concerning, problematic or inappropriate behaviour are identified, the DSL will review relevant policies and procedures with the senior leadership team, governing body and staff team as appropriate and take any appropriate action such as curriculum review or further staff training as required.

All responses will be underpinned by a zero tolerance approach to sexual violence and sexual harassment, i.e. that it is never acceptable and will not be tolerated at this school. All concerns, discussions, decisions and reasons for decisions will be recorded as with all other safeguarding concerns. The four scenarios are:

1. Manage internally

In some cases of sexual harassment, e.g. one-off incidents, the school may take the view that the children concerned are not in need of early help or statutory intervention and that it would be appropriate to handle the incident internally, perhaps through utilising the behaviour policy and anti-bullying procedures, speaking to the alleged perpetrator and her/his parents, making expectations of future behaviour clear (in writing where appropriate) and by providing pastoral support. Careful consideration will be given to the need to separate the victim and alleged perpetrator/s in lessons (as with sexual assaults) pending investigation; and possibly thereafter.

2. Early help

The school or college may decide that the child/ren involved do not require statutory interventions but may benefit from early help, which can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

Early help and the option to manage a report internally are not mutually exclusive. The school may decide to manage the report internally but may also offer early help to both the victim and perpetrator(s).

3. Referrals to Children's Social Care

In keeping with an explicit requirement set out in Keeping Children Safe in Education 2025, where a child has been harmed, is at risk of harm, or is in immediate danger, the school will make a referral to Children's Social Care. All instances of sexual activity between pupils/students on the school premises will be referred to Children's Social Care. All instances of sexual violence perpetrated by a child under ten years of age will be referred to Children's Social Care. This will facilitate a consultation about the role of the Police. Whilst the age of criminal responsibility is 10 years, the starting principle of reporting to the Police via the Children and Families Front Door remains. The Police will take a welfare, rather than a criminal justice, approach.

When referring to Children's Social Care, the school will generally inform parents or carers, unless there are compelling reasons not to (i.e. if informing a parent or carer is going to put the child at additional risk or create undue delay). Any such decision should be made with the support of Children's Social Care.

Collaborative working will help ensure that the best possible package of co-ordinated support is implemented for the victim and, where appropriate, the alleged perpetrator and any other children that require support.

However, the school will not wait for the outcome (or even the start) of a Children's Social Care investigation before protecting the victim and other children in the school. The DSL (or a deputy) will work closely with Children's Social Care (and other agencies as required) to ensure any actions the school takes do not jeopardise a statutory investigation. The risk assessment as above will help inform any decision. Consideration of safeguarding the victim, alleged perpetrator, any other children directly involved in the safeguarding report and all children at the school should be **immediate**.

In some cases, Children's Social Care will review the evidence and decide a statutory intervention is not appropriate. The school (generally led by the DSL or a deputy) will refer again, using the SP's practitioner escalation protocol as necessary if there is reason to believe that the child remains in immediate danger or at risk of harm – see (https://www.safeguardingwarwickshire.co.uk/safeguarding-adults/i-work-with-adults/practitioner-escalation-protocol and section 32 below.

If a statutory assessment is not appropriate, the DSL (or a deputy) will consider other support mechanisms such as early help, specialist support and pastoral support.

4. Reporting to the Police

Any report to the Police will generally be in parallel with a referral to Children's Social Care (as above).

Where the school receives a report of rape, assault by penetration or sexual assault, the starting point is this should be passed on to the Police. It is the prerogative of victims and their parents/carers to make direct complaints to the Police. However, the school should also be very clear with victims and parents/carers that the school has a duty to ensure the Police are informed when an alleged crime has been committed in order to safeguard other young people.

Where a serious crime is reported, the school can report directly to the local Police station. However, in most circumstances, the school will consult with the Children and Families Front Door in the first instance in order to ensure that both the Police and Children's Social Care are informed. The school will also take account of the National Police Chiefs' Council advice 'When to call the police: Guidance for schools and colleges' in deciding when to engage the Police directly and what to expect of them when they do:
2491596 C&YP schools guides.indd (npcc.police.uk).

Where a report has been made to the Police, the school will consult the Police and agree what information can be disclosed to staff and others; and, in particular, the alleged perpetrator and their parents or carers. They should also discuss the best way to protect the victim and their anonymity.

At this stage, the school will generally inform parents or carers unless there are compelling reasons not to such as the likelihood of putting a child at additional risk by informing a parent or carer. In circumstances where parents or carers have not been informed, the school will support the child in any decision taken in consultation with Children's Social Care and any appropriate specialist agencies.

In some cases, it may become clear very quickly that the Police (for whatever reason) will not take further action. In such circumstances, the school will continue to engage with specialist support for the victim and alleged perpetrator as required.

Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator(s), it will be important for the DSL (or a deputy DSL) to work closely with the Police (and other agencies as required) to ensure any actions the school takes do not jeopardise the Police investigation. The DSL will consult the Police in the event of any queries. Keeping Children Safe in Education 2025 states that "The police will help and support the school or college as much as they can (within the constraints of any legal restrictions)".

The school will also be informed by the Police or Children's Social Care about referrals made directly to those agencies from other sources (e.g. family members, family friends, parents of other children) in relation to alleged sexual offences or harmful sexual behaviours displayed by pupils/students inside and/or outside school.

In all such circumstances, the school may be required to attend a strategy meeting under the SP inter-agency child protection procedures in order to facilitate risk management and planning with other agencies.

The school is committed to participating in plans both to provide pupils who are at risk from other children and those pupils who may present a risk to other children with appropriate services to address any concerns and, wherever possible, to facilitate ongoing access to education in school for all children concerned, subject to appropriate risk assessments and risk management plans.

Subsequent considerations

The needs and wishes of the victim should continue to be paramount (along with protecting the child) as the case progresses. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that the school is a safe space for them.

Similarly, the alleged perpetrator/s has an ongoing right to an education and should be able to continue in their normal routine subject to the ongoing risk assessment and the needs of the victim.

Where a pupil is subject of Police bail with conditions; or Court bail with or without conditions after the first Court appearance; or is 'released under investigation (RUI)', the school will work with Children's Social Care and the Police to manage any implications and safeguard all pupils/students concerned without jeopardising the Police investigation. In seeking to develop a balanced set of arrangements that meet the needs of all pupils concerned, particular regard will be given to the additional stress and trauma that might be caused to a victim within the school; the potential for the suspected pupil to intimidate the victim or a witness; and the need to ensure that any risk management measures strike a balance between management of risk and the rights of an unconvicted person (e.g. rights to

privacy, family life, etc).
There may be delays in any case that is being progressed through the criminal justice system. The school will not wait for the outcome (or even the start) of a Police investigation before protecting the victim, alleged perpetrator(s) and other children in the school subject to the risk assessment as above.

If a student is convicted or receives a caution for a sexual offence, the school will update the risk assessment, ensure relevant protections are in place for all pupils and consider any suitable action in line with the behaviour policy. This process will include a review of the necessary actions to keep all parties safe and meet their needs. If the perpetrator remains at the school along with the victim, the school will meet with the student and her/his parents/carers to revisit and reiterate in writing expectations of the perpetrator in terms of future behaviour and complying with any restrictions and arrangements put in place to safeguard the victim and other students.

In the light of possible publicity, speculation and interest within the student and parent body, the school will consider any other measures necessary to safeguard both the victim and perpetrator, especially from any bullying or harassment (including online).

In respect of a not guilty verdict or a decision not to progress with a criminal prosecution, the school recognises that this will likely be traumatic for the victim and will continue to offer support. The alleged perpetrator is also likely to require ongoing support for what will have likely been a difficult experience.

Unsubstantiated, unfounded, false or malicious reports
As with all other safeguarding concerns about pupils, all concerns, discussions and decisions made, and the reasons for those decisions, will be recorded in writing. Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and addressed.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child and/or the person who made the allegation is in need of help or may have been abused by someone else and the allegation was a cry for help. In such circumstances, a referral to Children's Social Care may be appropriate.

If a report is found to be deliberately invented or malicious, the school will consider whether any disciplinary action is appropriate in accordance with the behaviour policy.

Ongoing response
Support will be tailored on a case-by-case basis. The needs and wishes of the victim will be paramount (along with protecting the child) in any response. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority will be to make the victim's daily experience as normal as possible, so that the school is a safe space for them.

The school recognises that sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Pupils that have a health need arising from sexual assault or abuse will be supported to access specialist NHS support from a Sexual Assault Referral Centre (SARC). SARCs offer confidential and non-judgemental support to victims and survivors of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children and adults, regardless of when the incident occurred.

Other support can include early help and referral to Children's Social Care; emotional and practical support for victims from Children and Young People's Independent Sexual Violence Advisors in the specialist sexual violence sector; and/or provision of a designated trusted adult in the school of the pupil's choice (as far as is reasonably possible) to talk to about

their needs. Every effort will be made to avoid isolating the victim, in particular from supportive peer groups, but it is recognised that there may be times when a victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. The school will provide a physical space for the victim to withdraw.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school will consider any suitable sanctions in light of the behaviour policy, including consideration of permanent exclusion. In all but the most exceptional of circumstances, the rape or assault by penetration will constitute a serious breach of discipline and lead to the view that allowing the perpetrator to remain in the school would seriously harm the education or welfare of the victim (and potentially other pupils or students).

Where the perpetrator is going to remain at the school, the principle would be to continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school and college premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

The school will have a difficult balancing act to consider. On one hand it needs to safeguard the victim (and the wider pupil/student body) and on the other hand provide the alleged perpetrator with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Support (and sanctions) will be considered on a case-by-case basis. An alleged perpetrator may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. Harmful sexual behaviours in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials. Advice will be taken, as appropriate, from Children's Social Care, specialist sexual violence services and the Police.

If a perpetrator (alleged or convicted) does move to another educational institution (for any reason), the school/college will make the new educational institution aware of any ongoing support needs and, where appropriate, potential risks to other children and staff. The DSL will take responsibility to ensure this happens as well as transferring the child protection file.

Sharing of nude and semi-nude images and videos

Children and young people who share nude and semi-nude images and/or videos of themselves or their peers are breaking the law. However, as highlighted in national guidance, it is important to avoid criminalising young people unnecessarily. The primary concern at all times will be the welfare and protection of the children involved. The school will work in partnership with external agencies with a view to responding proportionately to the circumstances of any incident.

The school will act in accordance with advice endorsed by DfE 'Sharing nudes and semi-nudes - Advice for education settings working with children and young people - Responding to incidents and safeguarding children and young people'.
(UK Council for Internet Safety 2024) - https://www.gov.uk/government/pubications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people.

The sharing of nude and semi-nude images and/or videos by young people is a safeguarding issue and can be a sign that children are at risk. Pupils being coerced or pressurised by other children to create and share such images is a form of sexual harassment; and can also be part of a wider process of child on child abuse, grooming, criminal and/or sexual exploitation.

However, the school also recognises that children and young people's motivation for sharing nude and semi-nude images and/or videos can also include flirting, developing trust in a romantic relationship, seeking attention, for a 'joke' or because they are too young to understand the risks involved in doing so. Although technically an offence, such sharing of material of that nature is referred to as 'experimental' and it is usually not necessary or appropriate to criminalise young people in those circumstances.

Although there are clear risks associated with such behaviour and those children are likely to need support, it is unlikely they have any intention to cause harm or distress to anybody; whereas children and young people who have been pressured to share nude and semi-nude images are more likely to report negative consequences.

The UKCIS guidance named above highlights that "Addressing sensitive issues promotes a whole setting approach to safeguarding, giving children and young people the space to explore key issues and the confidence to seek the support of adults should they encounter problems. It is important to recognise how difficult it may be for children and young people to challenge or deny their peers' requests for images, especially those to whom they are attracted or whose approval they seek. It may also be extremely difficult for them to ask adults for help. Children and young people may have made a decision they are worried about and may find it difficult or embarrassing to ask for help. It is essential that lessons help children and young people develop the confidence they may need to put their skills and strategies into action".

This school is committed to providing an emotionally safe learning environment in order for children to be able to explore issues and ask staff for help when they need it. Staff are trained and expected to respond to disclosures of concern about sharing nude or semi-nude images and/or videos in the same way they respond to all other disclosures of child protection issues, as set out in this policy.

The school also recognises that a child's circumstances, background or sexuality may make them additionally vulnerable to wanting to share nude and semi-nude images and/or videos consensually and/or to being pressured, manipulated or coerced into doing so. Those factors may include:

- being in care;
- having special educational needs or a disability;
- having been a victim of abuse;
- having less direct contact with parents;
- lacking positive role models at home.

Where there are wider concerns about the care and welfare of a child or young person who has shared indecent images of themselves or other children, consideration will be given to referring to Children's Social Care.

Staff are trained to be vigilant and to notice and record any concerns about young people sending and receiving indecent images, which includes listening to what young people say to each other and to staff. In addition to reporting disclosures, staff are expected to report <u>any</u> evidence or suspicion about pupils sharing nude and semi-nude images and/or videos with other pupils - or anybody else outside the school - to the DSL, as with all other safeguarding issues and concerns. Staff will not make their own judgements about whether any such issue is serious enough to warrant a report to the DSL. What may seem like a less serious concern to an individual member of staff may be more significant when considered in the light of other information known to the DSL, which the member of staff may not be aware of.

If staff become concerned about the possible sharing of indecent images of children in relation to a device in the possession of a pupil (e.g. mobile phone, tablet, digital camera), the member of staff will secure the device (i.e. it should be confiscated). This is consistent with DfE advice Searching, Screening and Confiscation - Advice for schools (DfE 2022), page

17 'Items found as a result of a search': https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1091132/Searching__Screening_and_Confiscation_guidance_July_2022.pdf

Staff will not look at or print any indecent images. The confiscated device will be passed immediately to the DSL (see 'Viewing the imagery' below).

When concerns are identified, the DSL will discuss the concerns with appropriate staff and speak to young people involved as appropriate. Parents/carers will be informed at an early stage and involved in the process unless there is good reason to believe that involving them would put the young person at risk of significant harm.

In the event of a young person requesting that the school does not inform her/his parents/carers about an incident involving the sharing of nude or semi-nude images of themselves or other children, the DSL will need to consider issues in relation to Gillick competency and the Fraser guidelines in making a judgement – see links above.

If, at any point in the process, there is concern that a young person has been harmed or is at risk of harm, a referral will be made immediately to Children's Social Care and/or the Police via the Children and Families Front Door.

The Police will always be informed when there is reason to believe that indecent images involve sexual acts. Children under the age of 13 are unable to consent to sexual activity so any imagery depicting under 13-year olds will therefore also be referred to the Police.

With reference to definitions in 'Sharing nudes and semi-nudes - Advice for education settings working with children and young people' as above, the DSL will make a judgement about whether a reported incident of sharing nude and semi-nude images and videos is 'experimental' or 'aggravated'.

Aggravated incidents involve criminal or abusive elements beyond the creation, sending or possession of nude and semi-nude images and videos of children produced by children (i.e. under 18-year olds). These include the involvement of adult offenders, e.g. adults attempting to develop relationships by grooming children and young people and/or soliciting children to create and send indecent images to them; criminal or abusive behaviour by young people such as sexual abuse, extortion, threats, deception or exploitation; malicious conduct arising from personal conflicts such as break-ups or fights among friends; coercion; an imbalance of power, e.g. an older student pressurising a younger or vulnerable student to create and share an indecent image; or reckless creation, sending or showing of images without the knowledge or against the will of a young person who is pictured, causing that young person harm.

Examples of aggravated incidents include:

- evidence of adult involvement in acquiring, creating or disseminating indecent images of young people (possibly by an adult pretending to be a young person known to the victim);
- evidence of coercing, intimidating, bullying, threatening and/or extortion of students by one or more other students to create and share indecent images of themselves;
- pressure applied to a group of students (e.g. all female students in a class or year group) to create and share indecent images of themselves;
- pressurising a student who does not have the capacity to consent (e.g. due to their age, level of understanding or special educational needs) or with additional vulnerability to create and share indecent images of themselves;
- dissemination of indecent images of young people to a significant number of others with an intention to cause harm or distress (possibly as an act of so-called 'revenge porn', bullying or exploitation);

- what is known about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent;
- sharing of indecent images places a young person at immediate risk of harm, for example the young person is presenting as suicidal or self-harming.

Where there are abusive and/or aggravating factors, the school will always refer incidents to the Children and Families Front Door for advice about whether or not a response by the Police and/or Children's Social Care is required. This will facilitate consideration of whether:

- there are any offences that warrant a Police investigation;
- child protection procedures need to be invoked;
- parents/carers require support in order to safeguard their children;
- a Multi-Agency Child Exploitation (MACE) meeting is required;
- any of the perpetrators and/or victims require additional support. This may require the initiation of the Early Help Pathway to Change process and the offer of early help services.

The DSL will make a judgement about whether or not a situation in which the non-consensual sharing of nude or semi-nude images and/or videos within a small number of children in a known friendship group with no previous concerns constitutes an aggravated incident; or whether the school is able to contain the situation in partnership with all parents/carers of the pupils involved, arrange for the parents to ensure that all indecent images are deleted and that the children involved learn from the incident in order to keep themselves safe in future.

In the latter instance, the DSL will usually consult with the Police and/or Children's Social Care through the Children and Families Front Door to check that no other relevant information is held by those agencies and to ensure an agreed response is documented before proceeding.

Viewing the imagery - adults should **not** view youth produced sexual imagery unless there is good and clear reason to do so. Wherever possible, the DSL's responses to incidents will be based on what they have been told about the content of the imagery.

Any decision to view imagery will be based on the DSL's professional judgement. Imagery will never be viewed if the act of viewing will cause significant distress or harm to a pupil.

If a decision is made to view potentially indecent images, the DSL will be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies (i.e. it is not possible to establish the facts from the young people involved);
- is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent or carer in making a report;
- is unavoidable because a young person has presented an image directly to a staff member or nude or semi-nude images or videos have been found on a school device or network.

If it is necessary to view the imagery then the DSL will:

- never copy, print, share, store or save the image(s) because to do so is illegal. If that has already happened, the Police will be contacted for advice and to explain the circumstances;
- discuss and agree the decision to do so beforehand with Children's Social Care or the Children and Families Front Door Education Lead;
- ensure viewing is undertaken by the DSL or Deputy DSL with delegated authority from the headteacher;

- ensure viewing takes place with another member of staff present in the room, ideally the headteacher, another DSL or a member of the senior leadership team. The other staff member does not need to view the images;
- wherever possible, ensure viewing takes place on school premises, ideally in the headteacher or DSL's office;
- ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery;
- record how and why the decision was made to view the imagery in the pupil's safeguarding record, including who was present, why the nude or semi-nude images were viewed and any subsequent actions. Ensure the record is signed and dated and meets any appropriate wider standards, e.g. such as those set out in statutory safeguarding guidance and SP policies and procedures;
- if any devices need to be taken and passed onto the Police, the device(s) will be confiscated and the Police will be called. The device will be disconnected from Wi-Fi and data and turned off immediately to avoid imagery being removed from the device remotely through a cloud storage service. The device(s) will be placed in a secure place, for example in a locked cupboard or safe, until the Police are able to collect it from school.

Deletion of images - if the school has decided that other agencies do not need to be involved, then consideration will be given in consultation with parents/carers to deleting nude and semi-nude images and videos of children from devices and online services to limit any further sharing of the images/videos.

15. Support for pupils, families and staff involved in a child protection issue

Child abuse is devastating for the child and can also result in distress and anxiety for staff who become involved.

We will support pupils, their families, and staff by:
- taking all suspicions and disclosures seriously;
- nominating a link person (usually the DSL) who will keep all parties informed and be the central point of contact;
- Where a member of staff is the subject of an allegation made by a pupil, separate link people will be nominated to avoid any conflict of interest;
- responding sympathetically to any request from pupils or staff for time out to deal with distress or anxiety;
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies;
- storing records securely;
- offering details of helplines, counselling or other avenues of external support;
- following the procedures laid down in our child protection, whistleblowing, complaints and disciplinary procedures;
- co-operating fully with relevant statutory agencies.

16. Complaints procedure

Our complaints procedure will be followed where a pupil or parent raises a concern about poor practice towards a pupil that initially does not reach the threshold for child protection action. Poor practice examples include unfairly singling out a pupil or attempting to humiliate them, bullying or belittling a pupil or discriminating against them in some way. Complaints are managed by the headteacher, other members of the senior leadership team and governors. An explanation of the complaints procedure is included in the safeguarding information for parents and pupils.

Complaints from staff are dealt with under the school's complaints and disciplinary and grievance procedures.

Complaints which escalate into a child protection concern will automatically be managed under the school's child protection procedures.

17. Staff reporting concerns about a colleague or other adult who works with children (Whistleblowing)

Staff who are concerned about the conduct of a colleague - including visiting practitioners, temporary staff, governors, trustees and volunteers - towards a pupil are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood a situation and they will wonder whether a report could jeopardise a colleague's career. All staff must remember that the welfare of the child is paramount.
The school's **whistleblowing** procedure enables staff to raise concerns or allegations, initially in confidence, and for a sensitive enquiry to take place.

Staff are trained and expected to report **all** concerns about poor practice or possible child abuse by adults who work with children in school to the Principal to facilitate proactive and early intervention in order to maintain appropriate boundaries and a safe culture that protect children and reduce the risk of serious abuse in school. That includes allegations of concerns that may meet the harm test as defined in Keeping Children Safe in Education 2025; and also what may seem minor contraventions of the school's staff behaviour policy (code of conduct), referred to in KCSiE 2025 as 'low level concerns'.

There is no single way in which staff are required to report concerns of this nature. The most important thing is that the concern is brought to the attention of the Principal or nominated governor.

However, KCSiE 2025 states that all concerns including 'low-level concerns' should be recorded in writing, to include the details of the concern, the context in which they arose and the action taken; and that the name of the individual sharing their concerns should also be noted but that if the individual wishes to remain anonymous then that should be respected as far as is reasonably possible. NB The term 'low-level concern' does not mean that the concern is insignificant, it means that the behaviour towards a child may not be deemed to meet the harm threshold or require referral to the Local Authority Designated Officer (LADO).

Concerns should be logged using the proforma 'Logging A Concern about the behaviour of an adult who works with children' (also known as the 'Yellow form'). **All such forms should be passed directly to the Principal**. Alternatively, staff are free to approach the Principal directly to discuss their concerns.

Concerns or complaints about the Principal should be reported to the chair of directors, whose contact details are displayed in the staff room for any member of staff to use in such an instance. The 'Yellow form' should also be used for that purpose as above.

Staff may also report concerns about suspected abuse or neglect directly to Children's Social Care or the Police if they believe direct reporting is necessary to secure action to safeguard children.

Staff can also contact the Local Authority Designated Officer (LADO), who is responsible for the co-ordination of responses to allegations against people who work with children (see criteria, contact and referral details in section 16 below). The LADO's contact details are displayed on the safeguarding noticeboard in the staff room.

The NSPCC whistleblowing helpline is also available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 between 8.00a.m. and 8.00p.m., Monday to Friday or e mail help@nspcc.org.uk. Information is also available on the NSPCC website at https://www.nspcc.org.uk/what-you-can-do/reportabuse/dedicated-helplines/whistleblowing-advice-line/.

The NSPCC whistleblowing helpline and contact numbers for Children's Social Care, the Police and the LADO are all displayed in the staff room.

N.B. Staff are also encouraged to feel confident to self-refer to the Principal where they have found themselves in a situation that could be misinterpreted or might appear compromising to others; or, on reflection they recognise that their behaviour might be deemed to have contravened the staff behaviour (code of conduct) policy and/or to have fallen below expected professional standards.

18. Managing allegations against staff (including supply staff, volunteers and contractors)

When an allegation is made against a member of staff (including supply staff, volunteers and contractors), set procedures must be followed. The full procedures for dealing with allegations against staff can be found in Part 4 of Keeping Children Safe in Education 2025 and para 1.14 of Warwickshire SP multi-agency safeguarding procedures Allegations against staff or volunteers – https://westmidlands.procedures.org.uk/ykpzy/statutory-child-protection-procedures/allegations-against-staff-or-volunteers

As required by Keeping Children Safe in Education 2025, all allegations in respect of an individual who works (permanently or temporarily) or volunteers at the school that fulfil any of the following criteria (the harm test) will be reported to the Local Authority Designated Officer (LADO) within one working day:

- 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.

The LADO's team contact number is **01926 745376**. Referrals to the LADO will be submitted on a Position of Trust Referral Form and sent to lado@warwickshire.gov.uk.

All allegations against former members of staff or volunteers that meet the criteria will also be referred to the LADO in the first instance. On occasions, the LADO may not be able to advise about and/or co-ordinate the response to historical allegations because the current whereabouts of the former member of staff or volunteer are unknown and/or it is unknown whether the individual is currently employed or volunteering in a role involving work with children. In any such circumstances and following advice from the LADO, the matter will be reported to the Police.

Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress.

Suspension is not the default option and alternatives to suspension will always be considered. However, in some cases staff may be suspended where this is deemed to be the best way to ensure that allegations are investigated fairly, quickly and consistently and that all parties are protected. In the event of suspension, the school will provide support

and a named contact for the member of staff.

Staff, parents and governors are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites.

In accordance with Keeping Children Safe in Education 2024, the school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

NB it is the Principal's responsibility to contact and refer to the LADO when necessary. The only exceptions are when the allegation is against the Principal, in which instance the chair of Directors will undertake that responsibility; or where a member of staff is concerned that appropriate action has not been taken by the Principal in relation to an allegation against somebody who works at the school or feels anxious about reporting to those individuals, in which instance the member of staff should contact the LADO directly in order to safeguard children. The LADO's contact details are above and are readily accessible and visible to staff within the school on the staff safeguarding noticeboard in the staffroom.

In the event of a member of permanent or temporary staff, volunteer or contractor being dismissed or removed due to safeguarding concerns or they would have been had they not resigned, the school will fulfil its legal duty to make a referral to the Disclosure and Barring Service (DBS). Failure to refer when the criteria are met is a criminal offence.

Furthermore, where a permanent or temporary teacher is dismissed or the school ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, the school must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

19. Managing 'low level concerns' about staff conduct (including supply staff, volunteers and contractors)

Upon receipt of an allegation or concern about a member of staff's conduct that is in breach of the staff behaviour (code of conduct) policy but may not meet the harm test as above (defined in Keeping Children Safe in Education 2025 as a 'low level concern'), the Principal will have a decision to make about an appropriate and proportionate response in order to maintain the school as a safe environment for pupils/students to learn and staff to work in.

In the event that the Principal are not certain whether or not the allegation/concern meets the harm test, they will always contact the LADO for advice.

Once it has been established that the allegation or concern does <u>not</u> meet the harm test, actions are likely to include one or more of the following:

- Seeking advice from the school's HR advisor about whether or not the allegation/ concern warrants action including the possibility of an internal investigation subject to the school's disciplinary or capability procedures. That will include establishing whether or not it is necessary and proportionate to suspend the member of staff in the first instance in order to maintain the integrity of any investigation.
- If the allegation/concern does not warrant formal action or investigation, speaking to the member of staff and any other individuals as necessary to clarify the nature of the issues.
- Providing the member of staff with informal management advice. A written record of that advice will be made, shared with the member of staff and placed on their personnel file subject to HR advice and the school's record retention policy.

- Consideration of the need to amend school policies, procedures and staff training; and/or briefing all staff to remind them of relevant aspects of school policies with particular reference to the staff behaviour (code of conduct) policy.

Written records of all 'low level concerns' and the response to them will be retained securely in accordance with the requirements of Keeping Children Safe in Education 2025 and in compliance with the Data Protection Act 2018.

Low-level concerns about external staff including supply staff, other third-party providers and contractors **will** be notified to their employers so that any potential patterns of inappropriate behaviour can be identified; but the school will take responsibility for undertaking any investigation of concerns that arise within the school or in the conduct of offsite school business.

20. Staff training

It is important that all staff have training to enable them to recognise the possible signs of abuse, neglect, exploitation and radicalisation and to know what to do if they have a concern.

New staff, governors who will have direct contact with children and volunteers will receive an explanation during their induction which will include:

- the school's child protection policy
- signs and symptoms of abuse and neglect
- online safety
- child on child abuse
- extra-familial harms including criminal and sexual exploitation; county lines; serious violence; domestic abuse within intimate teenage relationships; and radicalisation;
- responding to disclosure of abuse or neglect by a child
- reporting and recording arrangements including allegations against and 'low level concerns' about the conduct of staff and visiting professionals
- the staff behaviour policy (code of conduct)
- the identity and role of the DSL and all Deputy DSLs
- the school's behaviour policy
- the school's safeguarding response to children who go missing from education.

NB all of the above will be explained **before** a new member of staff, governor or volunteer has direct contact with children in school. The school's child protection policy, staff behaviour policy (code of conduct) and behaviour policy will be sent with the letter confirming an appointment with a written requirement that the individual reads the three policies in advance of starting work at the school. The individual will be given an opportunity to clarify any issues on their first day at work and then asked to sign to confirm that they have read and understood all three policies and undertake to comply with them.

All staff, including the headteacher (unless the headteacher is the DSL), volunteers and governors will receive appropriate and regularly updated safeguarding and child protection training and thematic updates including online safety as required (at least annually) during inset days and regular discussions at staff meetings, to provide them with the requisite skills and knowledge to safeguard children effectively in line with statutory guidance, this policy and any requirements of the SP.

All staff will be made aware of the increased risk of abuse to certain groups, including children with special educational needs and disabilities, looked after children, previously looked after children, children with a social worker, young carers and risks associated with specific safeguarding issues including child sexual exploitation, child criminal exploitation, county lines activity, child on child abuse, sexual harassment and sexual violence in school, extremism, so-called honour based abuse including female genital mutilation and forced

marriage; and will receive training in relation to keeping children safe online.

The DSL and all deputy DSLs will attend training for newly appointed DSLs to provide them with the knowledge and skills required to carry out the role; and refresher training every two years. The DSL and all deputy DSLs will also undertake Prevent awareness training. Training will provide the DSL and all deputy DSLs with a good understanding of the DSL role, in accordance with Annex C of Keeping Children Safe in Education 2025 and will include the processes, procedures and responsibilities of other agencies, particularly Children's Social Care.

In addition, the DSL and all deputy DSLs will update their knowledge and skills at least annually to keep up with any developments relevant to their role and will be supported to access inter-agency training as part of their continuing professional development.

All governors and trustees will receive appropriate safeguarding and child protection (including online) training at induction to equip them with the knowledge to provide strategic challenge to test and assure themselves that the school's safeguarding policies and procedures are effective and support the delivery of a robust whole school approach to safeguarding. That training will be updated regularly (at least annually).

In addition, the headteacher (and/or other school leaders as appropriate) and at least one governor (usually the chair) will attend safer recruitment training and the school will ensure that there are at least two school leaders and/or governors that have attended safer recruitment training within the past three years.

Supply staff and other visiting staff will be given the school's **Visitor's Leaflet** which can be found at the front reception desk.

21. Safer recruitment and employment

Our school endeavours to ensure that we do our utmost to employ only 'suitable' staff and allow only 'suitable' volunteers to work with children by complying with the requirements of Keeping Children Safe in Education 2025 together with the school's and the SP Safer Recruitment policies.

Safer recruitment means that all applicants will:

- complete an application form which includes their employment history and explains any gaps in that history;
- provide two referees, including at least one who can comment on the applicant's suitability to work with children;
- provide evidence of identity and qualifications;
- if offered employment, be checked in accordance with the Disclosure and Barring Service (DBS) regulations as appropriate to their role. This will include:
    - an enhanced DBS check and a barred list check for those engaged in Regulated Activity, which includes unsupervised volunteers;
    - an enhanced DBS check without a barred list check for all volunteers not involved in Regulated Activity but who have the opportunity of regular contact with children;
    - an enhanced DBS check for all governors (not including associate members), which will only include a barred list check for governors involved in Regulated Activity;
- if offered employment, provide evidence of their right to work in the UK;
- be interviewed by a panel of at least two school leaders/governors, if shortlisted.

Schools are 'specified places' which means that the majority of staff and volunteers will be engaged in Regulated Activity. A fuller explanation of Regulated Activity can be found in Part 3 of Keeping Children Safe in Education 2025.

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The school will also

- ensure that every job description and person specification for roles in school includes a description of the role holder's responsibility for safeguarding;
- send a criminal record self-disclosure pro forma to all shortlisted candidates, who will be asked to submit the completed self-disclosure for the attention of the interview panel before the date of interview;
- explore any convictions, cautions and other relevant issues disclosed by the candidate at interview;
- consider carrying out an online search in respect of all shortlisted candidates in order to identify any information about incidents or issues of concern that is publicly available online, which the school might want to explore with the candidate at interview (N.B. recruitment materials will make an explicit statement about the school's policy in relation to online searches so that all applicants are fully informed. Online searches will only seek to identify information that is publicly available and will not include proactive searches of candidates' social media accounts);
- explore any issues arising from online searches with the candidate at interview;
- ask at least one value-based question at interview for every role in school about the candidate's attitude to safeguarding and motivation for working with children;
- verify the preferred candidate's mental and physical fitness to carry out their work responsibilities;
- obtain references for all shortlisted candidates, including internal candidates;
- carry out additional or alternative checks for applicants who have lived or worked outside the UK;
- ensure that applicants for teaching posts are not subject to a prohibition order issued by the Secretary of State;
- academies check that an applicant for a management position is not the subject of a section 128 direction made by the secretary of state prohibiting or restricting her/him from taking part in the management of an independent school, academy or free school;

At least one member of each recruitment panel will have attended safer recruitment training.

All new members of staff and volunteers will undergo an induction that includes familiarisation with the school's child protection and safeguarding policy, staff behaviour (code of conduct) policy, behaviour policy, other issues as in section 20 of this policy and identification of their child protection training needs.

All staff are required to sign to confirm they have received a copy of the child protection policy, Staff Behaviour (code of conduct) policy and behaviour policy.

All relevant staff (teachers, teaching assistants, other classroom-based staff, lunchtime supervisors and members of the senior leadership team, and all those who work in before or after school care for children under eight) are made aware of the disqualification from providing childcare legislation.

The school obtains written confirmation from supply agencies and third-party organisations that they have satisfactorily undertaken all appropriate checks in respect of individuals they provide to work in the school that the school would have undertaken if they were employing the individual directly; and that those individuals are suitable to work with children.

The school is required to obtain a copy of an enhanced DBS certificate from any agency or third-party organisation providing a member of staff to work in the school, irrespective of whether any matter or information is disclosed.

Trainee teachers will be checked either by the school or by the training provider, from whom written confirmation will be obtained confirming their suitability to work with children.

The school maintains a single central record of recruitment checks undertaken and ensures that the record is maintained in accordance with section 3 of Keeping Children Safe in Education 2025 and guidance issued by Warwickshire County Council.

In accordance with KCSiE 2025, the school will undertake all of the following checks in relation to alternative providers before placing pupils with the provider; and will also undertake ongoing checks as below:

- Obtain written confirmation from the alternative provider (AP) that all pre-employment checks as set out for school staff above have been completed by the provider in respect of any adult they employ to work with pupils of the school;
- State explicitly in the contract with the AP that the AP must notify the school of any changes in staffing before any new individual starts working with a pupil of the school;
- State explicitly in the contract with the AP that the AP must notify the school immediately of any safeguarding risks in relation to its staffing, premises or other children who use the AP's 45 services;
- State explicitly in the contract the requirement that the AP will maintain accurate records of where the child is at all times, including when accessing educational activities in satellite premises, offsite visits etc.;
- The school will review all placements with the AP for every pupil at least every half term to ensure the ongoing safety and suitability of the placement;
- The school will undertake an immediate review and/or terminate placements in the event of safeguarding concerns arising.

Volunteers

Volunteers will undergo checks commensurate with their work in the school and contact with pupils. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised or be allowed to engage in Regulated Activity.

Supervised volunteers

Volunteers who work only in a supervised capacity and are not in Regulated Activity will undergo the safer recruitment checks appropriate to their role, in accordance with the school's risk assessment process and statutory guidance.

Contractors

The school/college checks the identity of all contractors and their staff on arrival at the school/college and requests evidence of DBS checks where appropriate. As required by statutory guidance, where contractors and/or their staff are engaged in Regulated Activity, barred list checks are also requested. Contractors and any of their staff who have not undergone checks will not be allowed to work unsupervised or in Regulated Activity.

22. Site security

Visitors to the school, including contractors, are asked to sign in and are given an identity badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in. All visitors are expected to observe the school's safeguarding and health and safety arrangements to ensure children in school are kept safe. The headteacher will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

23. Behaviour

Our behaviour policy is set out in a separate document and is reviewed regularly by the governing body. It is shared with all staff before they start working with children as part of their induction. The policy is transparent to staff, parents and pupils.

The school's approach to behaviour is characterised by our wider emphasis on the importance of kindness, mutual respect and everybody's right to feel safe; and our belief that children learn how to behave safely by being supported and treated with respect by emotionally attuned adults, not by extrinsic rewards or punitive sanctions. Staff are trained and expected to model those core values through their day-to-day interactions with children and each other so that children learn by example and experience.
We are therefore committed to helping children to understand and embrace a small number of rules as set out in the school's Behaviour Policy, which are consistent with our core values and aimed at supporting children to behave safely.

The school recognises that children's behaviour is a form of communication and is committed to understanding what children are communicating in order to support them to feel safe and behave safely. Children may behave unsafely due to their developmental level; specific needs and understanding of the world around them; or due to previous or current trauma.

The school recognises that, in order to behave safely, children need to feel safe and it is therefore fundamentally important that staff are emotionally attuned to and available to pupils/students at all times in order to be trauma responsive. Staff are trained and expected to recognise that any pupil/student arriving at school not feeling safe – e.g. because of their lived experiences at home, during their journey to school or material they have seen or received online including child-on-child abuse - will need support from a trusted member of staff to regulate and develop the capacity to self-regulate their emotions.

Staff are therefore trained and expected to develop a range of safe strategies to respond supportively to children's behaviour which they may find challenging; as opposed to 'managing' children's behaviour.

The Behaviour Policy appropriately addresses the use of reasonable force by following statutory guidance:
'Use of reasonable force Advice for headteachers, staff and governing bodies' (DfE):
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/444051/Use_of_reasonable_force_advice_Reviewed_July_2015.pdf; and
'Reducing the Need for Restraint and Restrictive Intervention' (HMG):
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/812435/reducing-the-need-for-restraint-and-restrictive-intervention.pdf; and
Local guidance 'Guidance on the Use of Force and Physical Intervention':
https://www.safeguardingwarwickshire.co.uk/images/downloads/ESS-PB/PoliciesandProcedures/Guidance_on_the_Use_of_Force_and_Physical_Intervention_update_March_2018.pdf]

Keeping Children Safe in Education 2025 highlights that there are circumstances when it is appropriate for staff in schools and colleges to use reasonable force to safeguard children and young people. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

The school operates in accordance with Warwickshire County Council's Guidance on the Use of Force and Physical Intervention which highlights that staff should deploy every possible strategy to prevent the need for physical intervention. Those strategies would include de-escalation whenever there is a threat of violence or aggression towards an individual or property; communicating calmly with children; using non-threatening verbal and body language; helping children to recognise their own 'triggers' and 'early warning signs', and distracting or helping children to see a positive way out of a difficult situation.

However, the school supports staff to intervene physically and to use reasonable force when all of those strategies are unsuccessful in calming a situation; and a risk of physical harm to other children,

adults or the child her/himself, serious damage to property or serious disruption to the school remains. Staff should always be able to demonstrate that any such intervention is reasonable, proportionate and necessary in the circumstances, is used for the shortest possible period of time, deploys the minimum force that is necessary and is never used as a sanction.

If staff are required to use reasonable force in response to risks presented by any child with special educational needs or disabilities (SEND), mental health issues or with medical conditions, they will take the additional vulnerability of those children into account. In accordance with its duties under the Equality Act 2010 in relation to making reasonable adjustments and its Public Sector Equality Duty, the school will also seek to reduce the occurrence of challenging behaviour and the need to use reasonable force with those children by planning positive and proactive behaviour support, for instance by drawing up individual behaviour plans for more vulnerable children and agreeing them with parents/carers.

Searching

In accordance with DfE guidance Searching, screening and confiscation - Advice for schools - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1091132/Searching_Screening_and_Confiscation_guidance_July_2022.pdf, school staff can search a pupil for any item if the pupil agrees but the member of staff should ensure the pupil understands the reason for the search and how it will be conducted so that their agreement is informed.

The Principal and any member of staff authorised by the headteacher also has a statutory power to search pupils or their possessions, without consent, where they have reasonable grounds for suspecting that the pupil may have one or more of the following prohibited items in their possession: knives or weapons; alcohol; illegal drugs; stolen items; tobacco and cigarette papers; fireworks; pornographic images; indecent images of children; any article that a member of staff reasonably suspects has been, or is likely to be, used to commit an offence or to cause personal injury to or damage to the property of any person (including the pupil).

The Principal and authorised staff can also search for any item identified in the behaviour policy as prohibited and an item which may be searched for.

When searching or authorising other staff to search a pupil, the Principal will consider the age and needs of pupils being searched. This includes the individual needs or learning difficulties of pupils with SEN and making reasonable adjustments that may be required where a pupil has a disability.

School staff can confiscate any prohibited item found as a result of a search. They can also confiscate any item they consider harmful or detrimental to school discipline.
In the event that a member of staff suspects that a confiscated device contains indecent images of children, they will pass the device to the DSL and will not examine the device themselves. The DSL will take advice from the Police and/or Children's Social Care via the Children and Families Front Door before examining the device – see 'Viewing the Imagery' above.

Where the Principal or an authorised member of staff considers it necessary to search a pupil, they will ensure that the search is undertaken in accordance with the DfE advice for schools as above. Key principles include:

- The Principal will oversee the school's practice to ensure that a culture of safe, proportionate and appropriate searching is maintained, which safeguards the welfare of all pupils and staff with support from the DSL (or a deputy).
- The Principal will ensure that a sufficient number of staff are appropriately trained in how to search a pupil who is not co-operating lawfully and safely, so that those trained staff can support and advise other members of staff if that situation arises.
- The DSL will be informed of any searching incidents where the member of staff has reasonable grounds to suspect a pupil was in possession of a prohibited item as listed above.
- Staff are also expected to involve the DSL (or a deputy) without delay if they believe that a search has revealed a safeguarding risk. If the DSL identifies that a child is at risk of harm, they will make a referral to Children's Social Care immediately.
- The DSL (or a deputy) will also consider the circumstances of the pupil who has been searched to assess the incident against potential wider safeguarding concerns.
- A member of staff conducting a search must be of the same sex as the pupil being searched. There must be another member of staff present as a witness to the search. The only exception is that a member of staff can search a pupil of the opposite sex and/or without a witness present only:
    - if the member of staff carrying out the search reasonably believes there is risk that serious harm will be caused to a person if the search is not carried out as a matter of urgency; and
    - in the time available, it is not reasonably practicable for the search to be carried out by a member of staff who is the same sex as the pupil or it is not reasonably practicable for the search to be carried out in the presence of another member of staff.
- When a member of staff conducts a search without a witness they are expected to report that to the Principal immediately and ensure a record of the search is kept.
- A member of staff may search a pupil's outer clothing, pockets, possessions, desks or lockers.
- The member of staff conducting the search must not require the pupil to remove any clothing other than outer clothing. 'Outer clothing' means any item of clothing that is not worn wholly next to the skin or immediately over a garment that is being worn as underwear, as well as hats, shoes, boots or scarves.
- A strip search is a search involving the removal of more than outer clothing. Strip searches on school premises can only be carried out by police officers under the Police and Criminal Evidence Act 1984 (PACE) Code A and in accordance with PACE 1984 (PACE) Code C.
- While the decision to undertake the strip search itself and its conduct are Police matters, school staff retain a duty of care to the pupil(s) involved and are expected to advocate for pupil wellbeing at all times.
- Before calling the Police into school, the Principal or DSL will assess and balance the risk of a potential strip search on the pupil's mental and physical wellbeing against the risk of not recovering the suspected item; and will consider whether introducing the potential for a strip search through Police involvement is absolutely necessary,

always ensuring that other appropriate, less invasive approaches have been exhausted.

- Once the Police are on school premises, the decision on whether to conduct a strip search lies solely with them, and the role of the school is to advocate for the safety and wellbeing of the pupil(s) involved.
- Unless there is an immediate risk of harm and where reasonably possible, the headteacher/principal or DSL will inform a parent of the pupil suspected of concealing an item in advance of the search, even if the parent is not acting as the appropriate adult. Parents will always be informed by the Principal or DSL once a strip search has taken place.
- Except in cases of urgency where there is risk of serious harm to the pupil or others, whenever a strip search involves exposure of intimate body parts there will be at least two people present other than the pupil, one of which will be the appropriate adult.
- If the pupil's parent would like to be the appropriate adult, the school will facilitate this where possible. The Principal or DSL will ensure that Police officers carrying out the search are of the same sex as the pupil being searched. An appropriate adult not of the same sex as the pupil being searched may be present if specifically requested by the pupil.
- Otherwise, no-one of a different sex to the pupil being searched is permitted to be present, and the search will not be carried out in a location where the pupil could be seen by anyone else.
- Except in urgent cases as above, a search of a pupil will take place without an appropriate adult only if the pupil explicitly states in the presence of an appropriate adult that they do not want an appropriate adult to be present during the search and the appropriate adult agrees. A record will be made of the pupil's decision and signed by the appropriate adult.
- PACE Code C states that a strip search may take place only if it is considered necessary to remove an item related to a criminal offence and the Police officer reasonably considers the pupil might have concealed such an item. Strip searches should not be routinely carried out if there is no reason to consider that such items are concealed.
- The role of the appropriate adult is to safeguard the rights, entitlements and welfare of children in Police custody. This adult must not be a Police officer or otherwise associated with the Police. Examples of an appropriate adult include, but are not limited to, a parent, relative, social worker, teacher or, if the person is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.
- Pupils will be given appropriate support, irrespective of whether the suspected item is found. If an item is found, this may be a Police matter but will always be accompanied by a safeguarding process handled by the school which gives attention to the pupil's wellbeing and involves the DSL (or a deputy).
- Safeguarding should also be at the centre of support following a strip search in which the item is not found, both in the sense of supporting the pupil to deal with the experience of being searched, and regarding wider issues that may have informed the decision to conduct a strip search in the first place.
- Whether or not any items have been found as a result of any search, the Principal and DSL will consider whether the reasons for the search, the search itself, or the outcome of the search give cause to suspect that the pupil is suffering, or is likely to suffer harm, and/or whether any specific support is needed. Where this may be the case, the DSL (or a deputy) will follow this policy in considering the need to make a referral to an external agency or offer early help.
- Parents will always be informed of any search for a prohibited item that has taken place, and the outcome of the search as soon as is practicable. The Principal or DSL will inform the parents of what, if anything, has been confiscated and the resulting action the school has taken, including any sanctions applied.
- Any complaints about searching or confiscation will be addressed through the

school's complaints procedure.

24. Record Keeping

The school will maintain safeguarding (including early help) and child protection records in accordance with Annex C of *KCSiE* 2025 and the Warwickshire County Council Education Safeguarding Service guidance document Safeguarding Children - Information and Record Keeping - https://www.safeguardingwarwickshire.co.uk/images/downloads/ESS-PB/Record- Keeping/Record_Keeping_Guidance_Sept_2019.pdf

The school will:

- keep clear detailed written records of concerns about children (noting the date, event and action taken), even where there is no need to refer the matter to Children's Social Care immediately;
- keep records in a meticulous chronological order, either on paper or electronically;
- ensure all records are kept secure and in locked locations;
- ensure all safeguarding records are transferred - separately from the child's main pupil file - to the receiving school, college or other education establishment when a pupil moves. The DSL will do this as soon as possible, ensuring secure transit, and will ensure that confirmation of receipt of the records is obtained.
- the DSL will also consider whether it is appropriate to share any information with a child's receiving school/setting in advance of the child leaving so that the receiving school/setting is able to support the child as effectively as possible and plan for her/his arrival.
- ensure that incoming safeguarding records are brought to the attention of the DSL, Deputy DSLs and other key staff such as the SENCO when a child transfers in from another school/setting.

Safeguarding and child protection records will be maintained independently from the pupil's school file and the school file will be 'tagged' to indicate that separate information is held. Such records will only be accessible to the Designated Safeguarding Lead, deputy DSLs and school leaders who need to be aware.

Staff will record any safeguarding or child protection observations or concerns about a child by logging the concern on CPOMS or by completing a green form. The same format will be used by staff to record and report any observations or concerns that suggest a child might benefit from early help.

Staff are trained and expected to make a full record of all conversations with pupils relating to safeguarding concerns, whether or not the child makes some form of disclosure.

Such records will include, in addition to the name, address and age of the child, timed and dated observations describing the child's behaviour, appearance, statements/remarks made to staff or other children and observations of interactions between the child, other children, members of staff and/or parents/carers that give rise to concern. Where possible and without interpretation, the exact words spoken by the child or parent/carer will be recorded. Records will be signed, dated and timed by the member of staff making the record.

Records of safeguarding/child protection observations or concerns can be completed electronically or as a paper version but it is most important that **one consistent system for the recording of concerns is readily accessible to every member of staff irrespective of role and that all records are passed to the Designated Safeguarding Lead**.

The DSL is responsible for ensuring that the record of all concerns, discussions, decisions made and the reasons for those decisions provides unequivocal clarity about the nature of concerns and the action taken by the school in response to safeguard the child when the file

is read retrospectively. This will also help if/when responding to any complaints about the way a case has been managed by the school; or in the event of needing to share the record with partner agencies (for example in support of a referral to Children's Services or in a child protection conference); or if the record is required as evidence in any Court proceedings.

Child protection records form a part of a child's pupil record, which parents ordinarily have a right to see. Any pupil or parent wishing to access the pupil's child protection records will need to submit a subject access request in writing to the school for consideration. Access to the record will then be arranged but records may be redacted in line with the requirements of the General Data Protection Regulation (GDPR) if releasing information would place the child, or any other person, at risk of significant harm.

The Data Protection Act 2018 and GDPR do not prevent school staff from sharing information with relevant agencies without the consent of parents, where that information may help to protect a child.

25. Confidentiality and Information Sharing

The school will manage and share confidential information about children in line with Information sharing - Advice for practitioners providing safeguarding services to children, young people, parents and carers (HMG 2024) - https://assets.publishing.service.gov.uk/media/66320b06c084007696fca731/Info_sharing_advice_content_May_2024.pdf

In making decisions about whether or not to share information about children for safeguarding purposes, the school will take particular account of the 'The seven golden rules for sharing information (including personal information), as follows:

1. All children have a right to be protected from abuse and neglect. Protecting a child from such harm takes priority over protecting their privacy, or the privacy rights of the person(s) failing to protect them. The UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA) provide a framework to support information sharing where practitioners have reason to believe failure to share information may result in the child being at risk of harm.

2. When you have a safeguarding concern, wherever it is practicable and safe to do so, engage with the child and/or their carer(s), and explain who you intend to share information with, what information you will be sharing and why. You are not required to inform them, if you have reason to believe that doing so may put the child at increased risk of harm (e.g., because their carer(s) may harm the child, or react violently to anyone seeking to intervene, or because the child might withhold information or withdraw from services).

3. You do not need consent to share personal information about a child and/or members of their family if a child is at risk or there is a perceived risk of harm. You need a lawful basis to share information under data protection law, but when you intend to share information as part of action to safeguard a child at possible risk of harm, consent may not be an appropriate basis for sharing. It is good practice to ensure transparency about your decisions and seek to work cooperatively with a child and their carer(s) wherever possible. This means you should consider any objection the child or their carers may have to proposed information sharing, but you should consider overriding their objections if you believe sharing the information is necessary to protect the child from harm.

4. Seek advice promptly whenever you are uncertain or do not fully understand how the legal framework supports information sharing in a particular case. Do not leave a child at risk of harm because you have concerns you might be criticised for sharing information. If staff have such concerns, they are trained to speak to the DSL or a deputy DSL. The DSL will seek advice, which may include contacting the school's legal advisor or Children's Social

Care or following the NSPCC's safeguarding guidance.

5. When sharing information, ensure you and the person or agency/organisation that receives the information take steps to protect the identities of any individuals (e.g., the child, a carer, a neighbour, or a colleague) who might suffer harm if their details became known to an abuser or one of their associates.

6. Only share relevant and accurate information with individuals or agencies/organisations that have a role in safeguarding the child and/or providing their family with support, and only share the information they need to support the provision of their services. Sharing information with a third party rarely requires you to share an entire record or case-file – you must only share information that is necessary, proportionate for the intended purpose, relevant, adequate and accurate.

7. Record the reasons for your information sharing decision, irrespective of whether or not you decide to share information. When a partner agency requests information from the school and the DSL decides not to share it, the DSL will explain why they chose not to do so and will reconsider their decision if the requestor shares new information that might cause them to regard the information the school holds in a new light. The DSL will record the rationale for their decision and be prepared to explain their reasons if they are asked.

All staff are trained to understand that child protection issues warrant a high level of confidentiality, not only out of respect for the pupil, family and staff involved but also to ensure that information being released into the public domain does not compromise evidence.

The Data Protection Act 2018 (DPA) and the GDPR places duties on the school and individual staff to process personal information fairly and lawfully and to keep the information they hold safe and secure.

However, neither the DPA nor the GDPR prevent or limit the sharing of information for the purposes of keeping children safe. Keeping Children Safe in Education (DfE 2025) states clearly that "Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children".

Staff will ensure confidentiality protocols are adhered to and information is shared appropriately. If in any doubt about confidentiality, staff will seek advice from the DSL, another SLT member or outside agency as required (e.g. Children and Families Front Door Education Lead).

It is reasonable for staff to discuss day-to-day concerns about pupils with colleagues in order to ensure that children's general needs are met in school. However, staff should report all child protection and safeguarding concerns to the DSL or headteacher or – in the case of concerns about the headteacher – to the chair of governors. The person receiving the referral will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Keeping Children Safe in Education 2025 emphasises that the DSL or a deputy DSL should always be available to discuss safeguarding concerns but in exceptional circumstances where neither the DSL nor any appointed deputy DSL is available, that should not delay appropriate action being taken and staff should speak to a member of SLT or take advice from Children's Social Care if they are concerned about a child.

The GDPR and the Data Protection Act 2018 do not prevent school staff from sharing

information with relevant agencies for the purposes of keeping children safe and promoting their welfare. All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

The DSL will normally obtain consent from the pupil and/or parents to share sensitive information within the school or with outside agencies. Where there is good reason to do so, the DSL may share information without consent, and will record the reason for not obtaining consent.

If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the DSL and data protection officer.

Information sharing will take place in a timely and secure manner and where:

- it is necessary and proportionate to do so; and
- the information to be shared is relevant, adequate and accurate.

Information sharing decisions will be recorded, whether or not the decision is taken to share.

All staff must be aware that they cannot promise a child/parent to keep secrets.

All safeguarding and child protection information will be handled in line with the principles of the Data Protection Act 2018, which require that sensitive information is:

- processed for limited purposes
- adequate, relevant and not excessive
- accurate
- kept no longer than necessary
- processed in accordance with the data subject's rights
- secure.

All written child protection and safeguarding information will be stored in a locked facility and any electronic information will be password protected. All child protection records will only be made available to relevant individuals with a valid professional reason to see them; parents/carers subject to a subject access request; and children upon request, subject to consultation with parents/carers and partner agencies as deemed appropriate by the DSL.

Every effort will be made to prevent unauthorised access to sensitive information. Any sensitive information that needs to be stored on portable devices such as laptop computers or tablets or on portable media such as a CD or flash drive will be password protected or encrypted and kept in locked storage.

The school's policy on confidentiality and information-sharing is available to parents and pupils on request.

26. Extended school and offsite arrangements

All extended and offsite activities are subject of a risk assessment to satisfy health and safety and safeguarding requirements. When our pupils attend offsite activities, including day and residential visits and work-related activities, the school will ensure that effective child protection and whistleblowing arrangements are in place.

When services or activities are provided by the governing body or proprietor under the direct supervision or management of school staff, the school's child protection policy and procedures will apply.

When hiring or renting the school's facilities to external organisations or individuals (for example community groups, sports associations and service providers that run community or extra-curricular activities), the governing body will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures (including safer recruitment procedures) in place; will inspect those as necessary; and will put arrangements in place for the external body to liaise with the school in respect of these matters as appropriate. This applies regardless of whether or not the children who attend any services or activities provided by the external body are children on the school roll.

The governing body will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; with the stipulation that failure to comply with the arrangements will lead to termination of the agreement.

The DSL will maintain an overview of all pupils accessing the wrap-around provision and will ensure that robust arrangements are in place for timely and effective two-way sharing of safeguarding information- including records of all safeguarding concerns between the school and the safeguarding lead for the wrap- around provision.

The DSL will also take responsibility for ensuring that robust procedures are in place to confirm attendance and swift reporting of non-attendance and children going missing from the wrap-around provision at any time when they should be there. The DSL will also ensure that effective quality assurance arrangements are in place in order to monitor the ongoing effectiveness of all safeguarding arrangements that the wrap-around provision has in place.

The school will refer to the code of practice Keeping Children Safe in Out of School Settings (DfE 2023) to identify and support groups/organisations/associations using school premises to understand the required safeguarding arrangements - see https://www.gov.uk/government/publications/keeping-children-safe-in-out-of-schoolsettings-code-of-practice

All staff are required to report any concerns about the conduct of adults using the school premises or involved in school business (including offsite and online) to the headteacher/principal in the same way they would report concerns about the conduct of school employees (please refer to section 17).

27. Photography and images

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place. The increasing misuse of artificial intelligence (AI) by some individuals to generate child sexual abuse images further highlights the need for those safeguards.

To protect pupils we will:

- seek their consent for photographs or video images to be taken;
- seek parental consent;
- ensure pupils are appropriately dressed; and
- encourage pupils to tell us if they are worried about any photographs/images that are taken of them.

Furthermore, when using images for publicity purposes (e.g. on our website or in newspapers or publications), we will:

- avoid naming children when possible;
- if it is necessary to name children, use first names rather than surnames;

- if children are named, avoid using their image;

- establish whether the image will be retained for further use, where and for how long;
- ensure that images are stored securely and used only by those authorised to do so.

Staff will also be trained and required to assess very carefully whether taking photographs or video images; and publishing them as above is absolutely necessary for pupils' learning and/or in their best interests (e.g. to create learning journals, to provide evidence of academic progress, to celebrate significant achievements).

For the protection of pupils and staff, only school owned equipment will be used to record and store images taken by staff or volunteers on the school site or during offsite school activities including residential visits.

Parents are welcome to take still photographs of their **own children only** during school activities, subject to other restrictions notified to parents in advance in writing or verbally (e.g. parents may be asked not to take photographs during concerts/performances in order not to distract children who are performing or other audience members). Parents must not publish (including on social media) photographs of other children inadvertently captured during school events without the express permission of the parents of those children.

Parents are welcome to video record their **own children only** during school activities, subject to the same terms and conditions as for photographs above.

Visiting practitioners who work directly with children are subject to the same restrictions as school staff and volunteers in respect of recording and storing images of children. However, some visiting professionals are permitted to record images of the premises only specifically for professional purposes and in order to support the school, e.g. professionals providing advice or preparing quotations for work such as maintenance, health and safety and building.

28. Online Safety including filtering and monitoring arrangements

Pupils regularly use school-owned tablets and computers and access the internet via the school's connection to support their learning as part of the curriculum.

Out of school, children and young people also share content and images via social networking sites such as Snapchat, Instagram, TikTok, Facebook and Twitter. Online gaming with linked chat function is also popular with many young people.

Those technologies and the internet are a source of fun, entertainment, communication and education. Unfortunately, however, some adults and young people will use those technologies to harm children and the use of technology has become a significant component of many safeguarding issues. Technology often provides the platform that facilitates harm through child criminal and sexual exploitation; county lines activity; radicalisation; sexual predation; child on child abuse including sexual harassment and cyber bullying.

The breadth of issues within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

- **content**: being exposed to illegal, inappropriate or harmful content; for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories;

- **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;
- **conduct**: online behaviour that increases the likelihood of, or causes, harm; for example: making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nude and semi-nude images/videos of children and/or pornography, sharing other explicit images and online bullying; and pornography, sharing other explicit images and online bullying; and

- **commerce** - risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If the school has any reason to believe that any pupil/student or member of staff is at risk from phishing, a report will be made to the Anti-Phishing Working Group (https://apwg.org/).

All staff receive online safety training and are trained to be vigilant about and to report any concerns about risks to children online in the same way that they notice and report offline concerns. The school's **online safety policy** explains our approach to keeping pupils safe in school and protecting and educating pupils in the safe use of technology including ways for them to report any harmful, distressing or abusive online content, contact, conduct or commercial activity.

The school's online safety co-ordinator is: Megan Bishop

The DSL has ultimate responsibility for ensuring that online safety, including filtering and monitoring arrangements, are effective in keeping children safe and ensures that all reports/ alerts of safeguarding concerns arising from filtering and monitoring are reported to the DSL.

The school complies with the standards Meeting digital and technology standards in schools and colleges (DfE, updated 2025) – see https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-andcolleges/filtering-and-monitoring-standards-for-schools-and-colleges 58 In accordance with those standards, the school has appropriate filters and monitoring systems in place to protect children from potentially harmful online material when they use school-owned devices and access the school's internet connection.

In accordance with those standards, the school has appropriate filters and monitoring systems in place to protect children from potentially harmful online material when they use any school-owned devices and access the school's internet connection (managed externally by WES ICTDS). When the monitoring system identifies any online activity that gives rise to safeguarding concerns, all such reports go through to the DSL and are logged on CPOMS. The school is unable to filter or monitor activity on devices not owned by the school.

All staff are trained to understand the importance of proactive physical supervision of pupils/students' use of school-owned devices and the school's ICT system in order to safeguard them from any harmful content and prevent inappropriate conduct, particularly in relation to those pupils known to be vulnerable or at risk.

All staff are trained and expected to report:
• if they see or suspect that unacceptable content has been accessed; or

• unacceptable content is getting past the filters and therefore can be accessed by pupils/students; or
• if planned curriculum may lead to a spike in logs/alerts (e.g. content re: drugs, executions in history); or
• any failure or abuse of the filtering/monitoring system or perceived unreasonable restrictions; or
• any abbreviations/misspellings that are facilitating access to inappropriate content.

Chatrooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour and pupils are not allowed to access those sites when using school equipment. However, many pupils own or have access to handheld devices and parents are encouraged to consider measures to keep their children safe when using the internet and social media at home and in the community.

Parents may find it useful to refer to https://www.internetmatters.org/?gclid=Cj0KCQjwpf2IBhDkARIsAGVo0D3mX1CbugJH6cZ%20zSWJK-9eOVBkHPqFBvRtzLgQJ6IvluzbQqtw6eioaAqN0EALw_wcB for guidance on putting some restrictions in place to keep children safe online. Additional guidance is available on the school website and through regular information sharing on the school newsletter.

Cyberbullying, online sexual harassment and non-consensual sharing of nude and semi-nude images and/or videos will be treated as seriously as any other type of bullying or sexual harassment and will be managed through our anti-bullying and child on child abuse procedures (see 'Bullying, child on child abuse and harmful sexual behaviour' in section 14 above).

The school is unable to filter or monitor activity on devices not owned by the school.

KCSiE 2025 highlights that "Technology, and risks and harms related to it, evolve and change rapidly. Schools and colleges should consider carrying out an annual review of their approach to online safety, supported by an annual risk assessment that considers and reflects the risks their children face. A free online safety self-review tool for schools can be found via the 360 safe website or LGfL online safety audit."
In accordance with KCSiE 2025 and Meeting digital and technology standards in schools and 59 colleges, the school will carry out an annual review of online safety including the filtering and monitoring arrangements, supported by an annual risk assessment that considers and reflects the changing needs of pupils/students and the risks they face.

The school will undertake additional reviews of the filtering and monitoring system when safeguarding risks are identified; there are any changes in working practice; or any new technology is introduced.

Reviews of filtering and monitoring will:

- include governors/trustees, SLT, the DSL and the named individual/organisation responsible for undertaking filtering and monitoring of the school's ICT system;
- include staff and pupils/students as appropriate to check that the filtering and monitoring arrangements are working effectively;
- consider the risk profile of pupils/students, current filtering (reviewing what is currently blocked and not blocked), any specific safeguarding issues (e.g. county lines, self-harm), and teaching/curriculum requirements (e.g. H&RSE);
- audit all school-owned devices including mobile devices, ensuring that all apps can be

removed centrally and routinely;

- test whether filtering works effectively when school-owned devices are used away from school.

In order to safeguard pupils/students from risks associated with artificial intelligence (AI), the school will operate in accordance with guidance provided by the Internet Watch Foundation – see https://www.iwf.org.uk/resources/ai-generated-child-sexual-abuse-material-professionals-resource/#guides;
and
Generative AI: product safety expectations - GOV.UK.

The school also recognises the risks of cyber-crime as highlighted in KCSiE 2024 and operates in accordance with the cyber security standards - see Meeting digital and technology standards in schools and colleges - Cyber security standards for schools and colleges - Guidance - GOV.UK (www.gov.uk)

Safeguarding pupils accessing remote education and virtual learning including communication between staff and pupils

Where school staff are delivering lessons remotely or communicating with pupils virtually (e.g. to children unable to attend school due to health issues or a pandemic), all such lessons and communication will be delivered and undertaken in accordance with the school's child protection, staff behaviour (code of conduct), behaviour and acceptable use of ICT policies. This will ensure that the school's filtering and monitoring software is enabled.

The school engage, inform and regularly remind parents/carers about the importance of children being safe online. Information will be provided for parents/carers about what their children are being asked to do online, the sites they will be asked to access and which school staff their children will be interacting with online.

The school will take account of DfE guidance Sa*feguarding and remote education - https://www.gov.uk/guidance/safeguarding-and-remote-education*
in relation to the planning and delivery of remote and virtual learning; as well as nationally recognised guidance including *Undertaking remote teaching safely | NSPCC Learning*; and *guidance from the UK Safer Internet Centre on safe remote learning*..

Staff will always use school/service owned devices and accounts for the delivery of online/virtual lessons/tutorials. Where possible, applications that facilitate the recording of lessons will be used subject to data protection and retention/storage guidelines. School leaders will randomly sample recorded lessons in order to safeguard pupils/students and staff and to ensure that policies are being followed.

When delivering online/virtual lessons on a one-to-one basis or communicating with vulnerable children who are not attending school via video chat, staff will speak to parents/carers before lessons/conversations commence and when they finish before logging off.

The school will request and obtain written consent from parents/carers including consent to record lessons and video conversations before staff communicate with children online.

It is important that all staff who interact with children online continue to look out for signs that a child may be at risk, distressed for some reason or vulnerable in some other way; and report and record any concerns to the DSL in the normal way. The DSL will respond to any such concern as they would any other safeguarding concern.

The school will ensure that online learning tools and systems are used in line with privacy and data protection/GDPR requirements.

Online/virtual lessons should be timetabled and the headteacher or DSL will be able to drop into any virtual lesson at any time – the online version of entering a classroom for pupil/student welfare and safeguarding purposes.

Staff delivering online/virtual teaching will be expected to display the same standards of dress and conduct that they would when working face to face in school, modelling appropriate behaviour and presentation to pupils/students and parents.

Below are other issues that staff need to take into account when delivering online/virtual lessons or communicating with children online, particularly where webcams are used:

- Staff and children must be fully dressed and wear suitable clothing, as should anyone else in the household.
- Any computers used should be in appropriate areas, for example not in bedrooms; and the background should be blurred. If it is not possible to blur the background, staff must consider what children can see in the background and whether it would be appropriate in a classroom. This includes photographs, artwork, identifying features, mirrors etc.
- Staff will ensure that resources and videos used are age appropriate – the child may not have support immediately to hand at home if they feel distressed or anxious about content.
- Live classes should be recorded so that if any issues were to arise, the video can be reviewed.
- Live classes will be kept to a reasonable length of time so that children do not have too much screen time and in order to minimise disruption for the family.
- Language must be professional and appropriate, including that used by any family members in the background.
- Staff must only use platforms specified by senior managers and approved by the school's ICT manager/co-ordinator for communication with pupils/students
- Staff should record the length, time, date and attendance of any sessions held.

Staff members delivering lessons or communicating with children online/virtually will raise any issues in respect of inappropriate dress, setting, behaviour etc with the child and/or parent immediately and will end the online interaction if necessary. Any such incident will be recorded and reported to the DSL.

If a staff member believes that a child or parent is recording a lesson or conversation without prior consent, the lesson will be brought to an end or the child will be logged out immediately.

In **rare and exceptional circumstances** where staff urgently need to contact a pupil or parent by telephone and do not have access to a school-owned device, they will discuss this with a senior member of staff. If it is agreed there is no alternative to using a personally owned device, staff members will always use 'caller withheld' to ensure the pupil and/or parent is not able to identify the staff member's personal contact details.

Staff also receive advice regarding their personal online activity, use of social networking and electronic communication with pupils, about which there are strict rules outlined in The Holy Spirit MAC Staff Behaviour Policy. Staff found to be in breach of these rules may be the subject of a referral to the LADO and/or may be subject to disciplinary action.

29. Child protection procedures

Recognising abuse

To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment of children. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone.

Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by adult men or women or by another child or children. Staff are trained to understand and recognise indicators of all four categories of abuse as defined below.

There are four categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect

Physical abuse

A form of abuse which 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 (this used to be called Munchausen's Syndrome by Proxy but is now more usually referred to as fabricated or induced illness).

Emotional abuse

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

Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and **all** staff should be aware of it and of their school or college's policy and procedures for dealing with it (see section 14 above).

Neglect

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

a. provide adequate food, clothing and shelter (including exclusion from home or abandonment);
b. protect a child from physical and emotional harm or danger;
c. ensure adequate supervision (including the use of inadequate care-givers); or
d. ensure access to appropriate medical care or treatment.

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

Definitions taken from Keeping Children Safe in Education (DfE 2024).

Indicators of abuse

Physical signs define some types of abuse, for example bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For those reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the Designated Safeguarding Lead.

It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.

A child who is being abused or neglected may:

- have bruises, bleeding, burns, fractures or other injuries;
- show signs of pain or discomfort;
- keep arms and legs covered, even in warm weather;
- be concerned about changing for PE or swimming;
- look unkempt and uncared for;
- change their eating habits;
- have difficulty in making or sustaining friendships;
- appear fearful;
- be reckless with regard to their own or other's safety;
- self-harm;
- frequently miss school or arrive late;
- show signs of not wanting to go home;
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn;
- challenge authority;
- become disinterested in their schoolwork;
- be constantly tired or preoccupied;
- be wary of physical contact;
- be involved in, or particularly knowledgeable about drugs or alcohol;
- display sexual knowledge or behaviour beyond that normally expected for their age and/or stage of development; and/or
- acquire gifts such as money or a mobile phone from new 'friends' or adults recently acquainted with the child's family.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw and each small piece of information will help the DSL to decide how to proceed.

It is very important that staff report all of their concerns, however minor or

insignificant they may think they are – they do not need 'absolute proof' that the child is at risk.

Impact of abuse

The impact of child abuse, neglect and exploitation should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach and the rest of their childhood and their adulthood may be characterised by one or more of the following: anxiety, depression or other mental health difficulties, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships, unfulfilled potential and long-term physical health difficulties.

Taking action

Any child in any family in any school could become a victim of abuse. Staff should always maintain an attitude of "It could happen here". **That includes the likelihood that child on child abuse happens in every school/college**.

Key points for staff to remember when taking action are:

- in an emergency take the action necessary to help the child, for example, call 999;
- report your concern to the DSL as quickly as possible – immediately when there is evidence of physical or sexual abuse and certainly by the end of the day;
- do not start your own investigation; share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family;
- complete a record of concern, using CPOMS/green forms and
- seek support for yourself if you are distressed or need to debrief.

If a member of staff or volunteer is concerned about a pupil's welfare

There will be occasions when staff may suspect that a pupil may be at risk without unequivocal evidence. The pupil's behaviour or normal presentation may have changed; their artwork could be unusual or bizarre; they may write stories or poetry that reveal confusion or distress; or staff may notice physical but inconclusive signs. In these circumstances, staff will try to give the pupil the opportunity to talk while remembering that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.

The signs that staff notice may be due to a variety of factors, for example a parent has moved out, a pet has died, a grandparent is very ill or an accident has occurred. Staff are encouraged and supported to ask pupils if they are OK, if there is anything the child would like to talk to them about and if they can help in any way. Staff are trained to do this by asking appropriate open questions which do not lead the child in any particular direction but invite the child to talk about anything if they wish to.

Staff are expected to use CPOMS/ green forms to record these early concerns and should make a full record of all conversations with pupils relating to safeguarding concerns, whether or not the child makes some form of disclosure. If the pupil does begin to reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the pupil, if the member of staff remains concerned, they should discuss their concerns with the DSL.

Concerns which do not meet the threshold for child protection intervention will be managed through the Early Help process as in section 9 of this policy.

If a pupil discloses abuse or neglect to a member of staff or volunteer

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual. Their abuser may have threatened what will happen if they tell. They may have lost all trust in adults. Or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

If a pupil talks to a member of staff about any risks to their safety or wellbeing including child on child abuse, **the staff member will need to let the pupil know that they must pass the information on** – staff are not allowed to keep unsafe secrets. The point at which they tell the pupil this is a matter for professional judgement. If they jump in immediately the pupil may think that they do not want to listen but if left until the very end of the conversation, the pupil may feel that they have been misled into revealing more than they would have otherwise.

They should have a good knowledge and understanding of why staff cannot keep some information confidential but also know that information is passed on to specific people on a 'need to know' basis only.

During their conversations with pupils, staff will:

- allow the child to speak freely;
- remain calm and not overreact – the pupil may stop talking if they feel they are upsetting their listener;
- give reassuring nods or words of comfort – '**I'm glad you told me'/'Thank you for telling me'; 'You're doing very well'; 'I believe you'; 'What happened to you is not your fault'/'This isn't your fault'; 'I'm going to do what I can to help you'**;
- not be afraid of silences – staff must remember how hard this must be for the pupil;
- **under no circumstances** ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the pupil's mother think about it;
  (**however**, it is reasonable to ask questions to clarify understanding and to support a meaningful referral if that is required, e.g. 'when did this happen', 'where did this happen?')
- at an appropriate time tell the pupil that in order to help them, the member of staff must pass the information on;
- not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused;
- avoid admonishing the child for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be the staff member's way of being supportive but may be interpreted by the child to mean that they have done something wrong;
- tell the pupil what will happen next;
- let the pupil know that someone (either the member of staff or another named person, e.g. the DSL) will come to see them before the end of the day;
- report verbally to the DSL (or headteacher if the child has made an allegation against a member of staff);
- write up their conversation as soon as possible on CPOMS/ green forms and pass it to the DSL (or headteacher if the child has made an allegation against a member of staff); and
- seek support if they feel distressed or need to debrief.

Notifying parents

The school will normally seek to discuss any concerns about a pupil with their parents/ carers. This must be handled sensitively and the DSL will make contact with the parent/ carer in the event of a concern, suspicion or disclosure. Other staff should not notify parents/carers unless they are explicitly asked to do so by the DSL.

Our focus is the safety and wellbeing of the pupil. Therefore, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will be sought first from Children's Social Care.

29. Making a referral to Children's Social Care

Keeping Children Safe in Education 2025 emphasises that the DSL (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns. The DSL will make a referral to Children's Social Care (and if appropriate the Police) if it is believed that a pupil is suffering or is likely to suffer significant harm.

The pupil (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child or create undue delay. Keeping Children Safe in Education 2025 also emphasises that **all** staff should be aware of the process for making referrals to Children's Social Care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

Statutory assessments

Children in need

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

Children suffering or likely to suffer significant harm

Local authorities, with the help of other organisations as appropriate, have a duty to make enquires under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of

abuse and neglect, female genital mutilation or other so-called honour-based violence, and extra-familial threats like radicalisation and sexual exploitation.

30. Submitting child protection referrals

All child protection referrals will be made as set out in local Safeguarding Partnership inter-agency procedures by telephoning Family Connect on 01926 414144.

All urgent child protection referrals, i.e. where there is an immediate concern about a child's safety, should be made in the first instance by telephoning the Children and Families Front Door on 01926 414144. This should be followed by submission of a MAC as above.

N.B. If a child is already the subject of an open case to Children's Social Care, the DSL will have the name and contact details of the allocated social worker. Further child protection concerns about any child in those circumstances must be referred directly to the allocated social worker, **not** to Family Connect. When there is an immediate concern about a child's safety, the DSL should contact the social worker by telephone in the first instance. Any difficulties in contacting the social worker must be escalated to their line manager, **not** to the Family Connect.

Outside of office hours, immediate concerns about a child will be referred to the Emergency Duty Team on 01926 886922.

Irrespective of the outcome of any discussion with Family Connect or a child's allocated social worker about a child the school believes to be at risk of significant harm, the school will confirm its concerns in writing

If staff are ever concerned that a child is in immediate danger, they will contact the Police by dialling 999.

Staff may seek support directly from the Children and Families Front Door Education Lead on 01926 418608 or via MASHeducationlead@warwickshire.gov.uk or triagehub@warwickshire.gov.uk should they consider that necessary.

31. Staff reporting directly to child protection agencies

Staff should ordinarily follow the reporting procedures outlined in this policy. However, as highlighted above, **all** staff should be aware of the early help process and understand their role in it; and **all** staff should be aware of the process for making referrals to Children's Social Care and for statutory assessments under the Children Act 1989. **Any member of staff may therefore refer their concerns directly to Children's Social Care and/or the Police if**:

- the situation is an emergency and the DSL, the deputy DSL, the headteacher and/or the chair of governors are all unavailable;
- they are convinced that a direct report is the only way to ensure the child's safety; or
- for any other reason they make a judgement that a direct referral is in the best interests of the child.

In any of those circumstances, staff may make direct child protection referrals and share information without being subject of censure or disciplinary action. However, staff should inform the DSL and/or headteacher at the earliest opportunity that they have made a direct referral unless in their judgement doing so would increase the risk of harm to the child.

If in any doubt, members of staff may consult Family Connect (details above) or seek support from the Children and Families Front Door Education Lead on 01926 418608 or via MASHeducationlead@warwickshire.gov.uk or triagehub@warwickshire.gov.uk.

32. What will Children's Social Care do?

The Warwickshire Safeguarding procedures state that callers to Family Connect will speak with a trained Child and Family Advisor or a social worker in the Triage Hub and enquiries will be triaged and directed to the appropriate service, ensuring a seamless process and a proportionate, timely response to children's needs. Family Connect also incorporates the Multi-Agency Safeguarding Hub (MASH), a partnership between - Warwickshire County Council, Warwickshire Police, The National Health Service (NHS) and other key partner agencies.

Children's Social Care should acknowledge receipt and make a decision about the type of response that is required within one working day of a referral being made; and should let the referrer know the outcome. This will include determining whether:

- the child requires immediate protection and urgent action is required;
- whether the child is in need, and should be assessed under section 17;
- there is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm; and whether enquiries must be made and the child assessed under section 47;
- any services are required by the child and family and what type of services; and
- further specialist assessments are required in order to help the local authority to decide what further action to take.

The school will follow up if this information is not forthcoming and if, after a referral, the child's situation does not appear to be improving, the school will consider following the SP Practitioner Escalation Protocol (WSCP Practitioner Escalation Policy) to ensure the referred concerns have been addressed and, most importantly, that the child's situation improves.
While every effort will be made to resolve concerns via informal discussion, the school will always complete the *Escalation Monitoring Form* (appendix 1 – Escalation-Monitoring-Form-FINAL.docx) when following the Practitioner Escalation Protocol. The DSL will share the completed form with the appropriate manager in Children's Social Care and a copy will be placed on the pupil's school safeguarding file.

While every effort will be made to resolve concerns via informal discussion, the school will always complete the Escalation Monitoring Form (appendix 1 – **Escalation Protocol Monitoring Form**) when following the Practitioner Escalation Protocol. The DSL will share the completed form with the appropriate manager in Children's Social Care and a copy will be placed on the pupil's school safeguarding file.

If Children's Social Care decide to carry out a statutory assessment, school staff will do everything they can to support that assessment, led and supported by the DSL (or deputy) as required.

33. Serious violence

All staff are made aware of indicators that children may be at risk from or are involved with serious violent crime; and are trained to record and report any concern about children at risk of or involved in perpetrating serious violence as with any other safeguarding concern. Indicators may include increased absence, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts could also indicate that children have been approached by or are involved with individuals associated with criminal gangs and/or criminal exploitation.

All staff are trained to be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

34. Extra-familial harms (contextual safeguarding)

Safeguarding incidents and/or behaviours can be associated with factors both outside children's home environments and outside school; and/or can occur between children outside the school. The DSL, deputy DSLs and all staff will consider the context within which such incidents and/or behaviours occur. Contextual safeguarding means that assessments of children should consider wider environmental factors present in a child's life that are a threat to their safety and/or welfare. Staff will listen to children and be vigilant about any signs or indicators that would suggest children may be at risk in the community and/or online and will share intelligence with the Police in order to prevent children suffering harm. Some extra-familial harms are likely to constitute significant harm and will therefore be referred to Children's Social Care as necessary. The school will provide as much information as possible when asked to do so as part of a police investigation and/or when making referrals to Children's Social Care, thus allowing any investigation or assessment to consider all the available evidence and the full context of any abuse.

35. Child sexual exploitation and child criminal exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse. **Child criminal exploitation (CCE)** is a form of child abuse. Both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual and/or criminal activity:

(a) in exchange for something the victim needs or wants; and/or
(b) for the financial advantage or increased status of the perpetrator or facilitator; and/or
(c) through violence or the threat of violence.

The victim may have been sexually and/or criminally exploited even if the sexual/criminal activity appears consensual. CSE and CCE do not always involve physical contact; they can also occur through the use of technology.

CSE and CCE can affect any child or young person, female or male, under the age of 18 years, including 16 and 17-year olds who can legally give consent to have sex.

Sexual exploitation can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they may have created and posted on social media).

CSE is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health.

It may also be linked to other criminal activity including trafficking and illegal drugs. Drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.

Criminal exploitation of children can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence. It can be perpetrated by individuals or groups; males or females; and young people or adults. It is typified by some form of power imbalance in favour of those perpetrating the exploitation. As well as age, the power imbalance can also be due to other factors including gender, cognitive ability, physical strength, status and access to economic or other resources.

Children and young people are often unwittingly drawn into sexual and/or criminal exploitation through grooming behaviour that may include the offer of friendship and care,

gifts, drugs, alcohol and sometimes accommodation.

Child criminal exploitation may include activities such as:

- a child travelling outside the area in which she/he lives in order to transport, distribute or sell drugs or money for others by whom they are being exploited. This form of criminal activity and exploitation is referred to as **county lines** (see below);
- a child committing crimes on behalf of or at the behest of others because they, their friends or relatives have been threatened, deceived or manipulated;
- a child being forced or manipulated to shoplift or pickpocket;
- a child being forced or manipulated to threaten other young people or adults;
- a child being forced or manipulated to commit acts of serious violence;
- a child being forced or manipulated to commit some form of vehicle crime;
- a child being forced or manipulated to work in a cannabis factory;
- a child being forced or manipulated to commit crime in order to settle actual or fabricated debts;
- gang membership, which may lead to the child being exploited to do something illegal or dangerous in return for kudos/status in the gang;
- a child being encouraged or manipulated to commit crime via social media;
- a child receiving food, money, kudos or status in return for storing a weapon or drugs for others.

NB it is important for adults to be aware that both boys and girls can suffer criminal exploitation although their experience of it may be very different. Furthermore, boys and girls who suffer criminal exploitation are likely to be at greater risk of sexual exploitation.

All staff are trained to be vigilant about and report indicators of CSE and CCE including:

- children appearing with money, clothes, mobile phones, etc. without plausible explanation;
- children who associate with other young people involved in exploitation;
- children in relationships with controlling or significantly older individuals or groups;
- children frequenting areas known for sex work and/or criminal activity;
- children who associate with gangs and/or become isolated from their peers/social networks;
- children who suffer from changes in emotional well-being;
- children receiving excessive texts/phone calls;
- multiple callers (unknown adults or peers) to children;
- concerning use of internet or other social media by children;
- increasing secretiveness around children's behaviours;
- children presenting inappropriate sexualised behaviour for their age and/or with sexually transmitted infections and/or becoming pregnant;
- children self-harming or presenting with significant changes in their emotional well-being;
- children returning home or arriving at school under the influence of drugs and/or alcohol;
- children who go missing for periods of time or regularly come home late;
- children who regularly miss school or education, have unexplained absences or do not take part in education;
- children being exposed to or perpetrating serious levels of violence; and/or being manipulated or forced into excessive violence towards others by somebody who is exploiting them (for further information see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf);
- evidence or suspicions of children suffering physical or sexual assault.

Although the following vulnerabilities increase the risk of child sexual and/or criminal exploitation, it must be remembered that not all children with these indicators will be exploited and child sexual and criminal exploitation can occur without any of these issues:

- having a prior experience of neglect, physical and/or sexual abuse;

- lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);
- recent bereavement or loss;
- social isolation or social difficulties;
- absence of a safe environment to explore sexuality;
- economic vulnerability;
- homelessness or insecure accommodation status;
- connections with other children and young people who are being sexually and/or criminally exploited;
- family members or other connections involved in adult sex work and/or other criminal activity;
- having a physical or learning disability;
- being looked after (particularly those in residential care and those with interrupted care histories);
- issues/anxieties about sexual identity.

The school teaches children about consent and the risks of sexual and criminal exploitation in the PSHE and SRE curriculum. A common feature of sexual and criminal exploitation is that the child often does not recognise the coercive nature of the relationship and does not see her/himself as a victim. The child may initially resent what she/he perceives as interference by staff but staff must act on their concerns, as they would for any other type of abuse.

All staff are trained to report all concerns about CSE and CCE to the DSL immediately. The DSL will consider the need to make a referral to Children's Social Care via the Children and Families Front Door (see sections 30 and 31 above) as with any other child protection concern and with particular reference to SP procedures. Parents will be consulted and notified as above.

Following a referral to Children's Social Care, a Multi-Agency Child Exploitation (MACE) meeting may be convened under SP inter-agency safeguarding procedures. The school will attend and share information at MACE meetings as required. Parents and young people will be invited to attend MACE meetings by Children's Social Care as appropriate.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other forms of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

For further information see:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741194/HOCountyLinesGuidanceSept2018.pdf).

https://www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit

36. So-called 'honour based' abuse

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to

protect or defend the honour of a family and/or community. Such crimes include Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

Staff will be alert to the possibility of a child being at risk of HBA or already having suffered HBA.

All forms of so-called HBA are abuse (regardless of the motivation) and staff will record and report any concerns about a child who might be at risk of HBA to the Designated Safeguarding Lead as with any other safeguarding concern. The DSL will consider the need to make a referral to the Police and/or Children's Social Care as with any other child protection concern; and may also contact the Forced Marriage Unit on 020 7008 0151 or via email at fmu@fco.gov.uk for advice as necessary.

Further information is available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1061641/Forced_marriage_guidance_17.03.22_FINAL.pdf

Female genital mutilation

Female genital mutilation (FGM) is a criminal offence. It is child abuse and a form of violence against women and girls and will be treated as such by this school. FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons. It has no health benefits and harms girls and women in many ways. The practice, which is most commonly carried out without anaesthetic, can cause intense pain and distress with long-lasting harmful consequences, including difficulties in childbirth.

The World Health Organisation estimates that three million girls undergo some form of FGM every year in Africa alone. It is practised in 28 countries in Africa and some in the Middle East and Asia. FGM is also found in the UK amongst members of migrant communities. UK communities that are most at risk of FGM include Kenyan, Somali, Sudanese, Sierra Leonean, Egyptian, Nigerian and Eritrean. Non-African communities that practise FGM include Yemeni, Afghani, Kurdish, Indonesian and Pakistani.

FGM typically takes place between birth and around 15 years old. However, it is believed that the majority of cases happen between the ages of 5 and 8.

In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003. Any person found guilty of an offence under the Female Genital Mutilation Act 2003 is liable to a maximum penalty of 14 years imprisonment or a fine, or both. It is also an offence for a UK national or UK resident (even in countries where FGM is not illegal) to perform FGM abroad; assist a girl to perform FGM on herself outside the UK; and assist (from outside the UK) a non-UK person to carry out FGM outside the UK on a UK national or UK resident.
(See https://www.gov.uk/government/publications/female-genital-mutilation-guidelines for further information).

If staff have a concern that a girl may be at risk of FGM or they suspect may already have suffered FGM, they will record their concern and inform the DSL as they would any other child protection concern. The DSL will discuss the concern with Children's Social Care with a view to making a referral and will inform the Police as appropriate.

Factors that may indicate a pupil may be at risk of FGM include:

- child's family have a low level of integration into UK society;
- child's mother and/or a sister have/has undergone FGM;
- FGM is known to be practised in the family's country of origin;

- child is withdrawn from PSHE;
- it is known that a female elder from the family's country of origin is visiting the family;
- child being taken on a long holiday to the country of origin;
- staff hear or overhear talk about a 'special' procedure to become a woman.

Indications that FGM may already have taken place may include a child:

- having difficulty or looking uncomfortable when walking, sitting or standing;
- spending longer than normal in the bathroom or toilet due to difficulties urinating;
- spending long periods of time away from a classroom during the day with bladder or menstrual problems;
- having frequent urinary, menstrual or stomach problems;
- having prolonged or repeated absences from school, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return;
- being reluctant to undergo normal medical examinations;
- confiding in a member of staff without being explicit about the problem due to embarrassment or fear;
- talking about pain or discomfort between her legs.

Teachers are subject to a statutory duty defined by Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) to report to the Police personally where they discover (e.g. by means of a disclosure) that an act of FGM appears to have been carried out on a girl who is aged under 18. This is known as mandatory reporting. It will be rare for teachers to see visual evidence and they should not examine pupils (unlike in the medical profession where an observation may be made). Information on when and how to make a report can be found at: Mandatory reporting of female genital mutilation: procedural information - GOV.UK (www.gov.uk).

Teachers in that situation will record their concerns and inform the DSL, who will support the teacher in making a direct report to the Police by calling 101 or, where there is a risk to life or likelihood of serious immediate harm, by dialling 999 immediately. In any case, reports to the Police will be made as soon as possible after the teacher discovers a child has suffered FGM and by the close of the working day at the latest. A child protection referral will also be made to Children's Social Care as soon as possible after the report to the Police and also by the close of the working day at the latest.

The duty does not apply in relation to children who a teacher suspects may be at risk of FGM (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers will record their concerns and inform the DSL in the normal way.

Further information about FGM can be found at:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/783684/FGM_The_Facts_A6_v4_web.pdf

Forced Marriage

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.
In a forced marriage situation, children may be married at a very young age, and well below the age of consent in England. School staff will be particularly alert to suspicions or

concerns raised by a pupil about being taken abroad and not being allowed to return to England.

Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under s.121 of the Anti-Social Behaviour, Crime and Policing Act 2014 – see https://www.gov.uk/forced-marriage and https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage/multi-agency-statutory-guidance-for-dealing-with-forced-marriage-and-multi-agency-practice-guidelines-handling-cases-of-forced-marriage-accessible for further information).

37. Protecting Children from Radicalisation and Extremism

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

Some children are vulnerable to extremist ideology and radicalisation. Protecting children from the risk of radicalisation is part of the school's wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. As such, the Designated Safeguarding Lead is responsible for the school's strategy for protecting children from those risks.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Extremism is the vocal or active opposition to fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. Even very young children have been exposed, in rare circumstances, to extremism at home and elsewhere including online.

As children get older, they look for adventure and excitement and they may start to ask questions about their identity and belonging. During that stage of their development they are vulnerable to extremist groups that may claim to offer answers, identity and a social network apparently providing a sense of belonging. Many of those extremist groups make sophisticated use of the internet and social media to target young people and spread their ideology, making young people more vulnerable to being influenced by extremist ideas. Young people who feel isolated or disaffected in some way are particularly vulnerable to radicalisation as they are other forms of abuse and exploitation.

The school has defined responsibilities to ensure that children are safe from terrorist and extremist material when accessing the internet in school.

During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised. The school is committed to preventing pupils from being radicalised and drawn into any form of extremism or terrorism. The school promotes the values of democracy, the rule of law, individual liberty, mutual respect and tolerance of those with different faiths and beliefs by providing pupils with opportunities through the curriculum to discuss issues of religion, ethnicity and culture and learn how to discuss and debate points of view; and by ensuring that all pupils are valued and listened to within school.

School staff receive training that provides them with both the information they need to understand the risks affecting children and young people in this area; and a specific understanding of how to identify individual children who may be at risk of radicalisation and how to support them. Staff are trained to report all concerns about possible radicalisation and extremism to the DSL immediately as they would any other safeguarding concern, identifying early indicators of possible radicalisation including changes in behaviour and attitudes to learning; and expressions of interest in extremist ideas along with a tolerance

towards potential violence to certain members of society.

The school recognises the importance of providing a safe space for children to discuss controversial issues; and building their resilience and the critical thinking skills they need in order to challenge extremist perspectives. However, the DSL (or deputy) will make appropriate referrals to the Police PREVENT team and Channel programme in respect of any pupil whose behaviour or comments suggest that they are vulnerable to being radicalised and drawn into extremism and terrorism in order to ensure that children receive appropriate support.

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

As a Channel partner, the school or college may be asked to attend a Channel panel to discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support.

The school will discuss any concerns about possible radicalisation identified in school with a child's parents/carers as with any other safeguarding or child protection issue unless there is reason to believe that doing so would place the child at risk; and will also support parents/carers who raise concerns about their children being vulnerable to radicalisation. Subject to consultation with the Police PREVENT team and in the interests of making proportionate responses, the school may offer support to children and their families through the provision of early help as appropriate.

The school expects all staff, volunteers, governors, visiting practitioners, contractors and individuals or agencies that hire school premises to behave in accordance with the school's Staff Behaviour Policy (code of conduct), will challenge the expression and/or promotion of extremist views and ideas by any adult on school premises or at school events and, when necessary, will make appropriate referrals in respect of any such adult.

Parents and staff may find the website www.educateagainsthate.com informative and useful. The website is designed to equip school and college leaders, teachers and parents with the information, tools and resources they need to recognise and address extremism and radicalisation in young people and how best to support them. The website provides information on training resources for teachers, staff and school and college leaders.

As part of the school's overall safeguarding arrangements and ongoing action plan for improvement, the DSL will consider identified local issues; intelligence from pupils, parents, staff and partner agencies; and new information from national issues and learning to review practice and procedures in order to keep pupils safe.

Referrals to the Prevent team will be made via https://safeinwarwickshire.com/prevent/, from where a Prevent Referral Form can be downloaded by clicking the button. The completed referral form will then be sent to prevent@warwickshireandwestmercia.pnn.police.uk.

Any queries about any issue in relation to preventing radicalisation and extremism; or any difficulties in accessing or completing the form can be addressed by calling **01386 591816**.

38. Children who are looked after, were previously looked after or who have a social worker

The most common reason for children becoming looked after is as a result of abuse or neglect. Children who were previously looked after potentially remain vulnerable. The

school ensures that staff have the necessary skills and understanding to keep children who are looked after and children who were previously looked after safe and ensures that appropriate staff have information about a child's looked after status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The designated teacher for children who are looked after and previously looked after and the DSL hold details of the social workers for all children who are looked after or were previously looked after; and the name and contact details of the Local Authority's virtual head for children who are looked after. The DSL will work closely with the designated teacher to monitor the progress of all children who are looked after or were previously looked after in order to ensure they receive the appropriate pastoral and academic support to promote their welfare and attainment.

Children with a social worker

The school/setting recognises that when a child has a social worker, that is an indicator that she/he may be more vulnerable to harm than other children as well as facing barriers to educational attainment in relation to attendance, learning, behaviour and poor mental health issues.

The school/setting will take those issues and needs into account when making plans to support children who have a social worker.

Care leavers

Local authorities have ongoing responsibilities to young people who cease to be looked after and become care leavers. That includes keeping in touch with them, preparing an assessment of their needs and appointing a Personal Advisor who develops a pathway plan with the young person. This plan describes how the local authority will support the care leaver to participate in education or training. The DSL will have details of the local authority Personal Advisor appointed to guide and support all care leavers; and should liaise with them as necessary regarding any issues of concern affecting a care leaver.

39. Private fostering arrangements

40.

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18 if the child has a disability) by someone other than a parent or close relative*, in their own home, with the intention that it should last for 28 days or more. Children looked after by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered.

*A close relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and stepparents; it does not include great-aunts or uncles, great grandparents or cousins.

On admission to the school, we will take steps to verify who has parental responsibility for the child and the relationship of the adults accompanying the child who is being registered.

Private fostering occurs in all cultures including British culture and a private fostering arrangement may start at any age.

Whilst most privately fostered children are appropriately supported, looked after and remain safe and well, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect; have been trafficked; are sexually or criminally exploited; or suffer modern-day slavery.

Parents and private foster carers both have a legal duty to inform Children's Social Care in the relevant local authority at least six weeks before the arrangement is due to start. Not to do so is a criminal offence.

Schools have a mandatory duty to report to Children's Social Care in the local authority where they are aware or suspect that a child is subject to a private fostering arrangement.

School staff are expected to notify the DSL when they become aware of or suspect private fostering arrangements. The DSL will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school will also fulfil its duty to inform the local authority of the private fostering arrangement.

41. Related safeguarding policies

- Staff Behaviour Policy (code of conduct)
- Physical intervention and the use of reasonable force
- Behaviour
- Personal and intimate care
- Complaints procedure
- Tackling bullying including prejudice-based bullying
- Physical contact
- Whistleblowing
- SEN
- Missing children
- Safer recruitment and selection
- Managing allegations
- Grievance and disciplinary

Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Many children see, hear or experience the effects of domestic abuse between family members at home.

Exposure to domestic abuse and/or violence can have a detrimental and long-term impact on a child's health, well-being, development, and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

(a) physical or sexual abuse;

(b) violent or threatening behaviour;

(c) controlling or coercive behaviour;

(d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and

(e) psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been, married to each other or civil partners; have agreed to marry or become civil partners; have been in an intimate relationship with each other; have shared parental responsibility for the same child; or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.

(The definition can be found here: https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted)

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.

Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

All concerns about children being affected by domestic abuse will be reported to the DSL as with any other safeguarding concern. The DSL will respond to the report by consulting Children's Social Care in order to establish whether a referral is required or the situation should be managed by discussion with parents/carers and possibly the offer of early help.

The school works in partnership with Warwickshire Police and Warwickshire Children's Services to support pupil who are affected by incidents of domestic violence and abuse. This scheme is called Operation Encompass.

When the police attend any incident of domestic violence or abuse in any households in which a pupil of the school lives, the Principal and another senior Designated Safeguarding Lead will receive a confidential and secure email on the morning of the next school day, notifying them simply that there has been an incident and that the child may need support.

On receipt of any such notification, the Principal and/or DSL will ensure that teachers and any other staff directly in contact with affected children support them with due kindness, care and sensitivity. In addition to supporting children, the process means that the school will also be able to offer parents and carers support as appropriate.

The information will be managed and stored with the utmost sensitivity and discretion consistent with other safeguarding records.

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

42. Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and any deputies) refer any concerns to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into Children's Social Care where a child has been harmed or is at risk of harm.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised that in some cases 16 and 17-year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the DSL (or a deputy) will ensure appropriate referrals are made based on the child's circumstances.

43. Special Circumstances (to be included as appropriate for your school)

Alternative Provision

KCSiE 2025 states that "Where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the provider meets the pupil's needs". The school will act in accordance with that guidance and the guidance Arranging Alternative Provision - guide for LAs and schools.

The DSL will maintain an overview of all pupils accessing any part of their learning from an alternative provider or via delivery online or offsite provided by any organisation or individual not employed by the school. The DSL will ensure that robust arrangements are in place for timely and effective two-way sharing of safeguarding information - including records of all safeguarding concerns - between the school and alternative/external providers.

The DSL will also take responsibility for ensuring that robust procedures are in place to confirm attendance and to enable the swift reporting of non-attendance and children going missing from alternative/ external providers at any time when they should be with that provider. The DSL will also ensure that effective quality assurance arrangements are in place in order to monitor the ongoing effectiveness of all safeguarding arrangements that alternative/external providers have in place.

Work experience

The school has detailed procedures to safeguard pupils undertaking work experience, including arrangements for checking people who provide placements and supervising pupils on work experience which are in accordance with the guidance in Keeping Children Safe in Education 2025.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. The school/college will access guidance highlighted in Keeping Children Safe in Education 2025, which explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers. Please see Get help with child arrangements - Get help with child arrangements (justice.gov.uk).

Children with family members in prison

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The school/college will seek to support pupils/students in this position through pastoral care, early help and discussions with parents/carers and other family members as appropriate; with reference to the guidance 'Supporting all professionals to work with offenders' children and their families – please see https://www.nicco.org.uk/

Elective home education (EHE)

Keeping Children Safe in Education 2024 acknowledges that "Many home educated children have a positive learning experience. We would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all. Elective home education can mean that some children are not in receipt of suitable

education and are less visible to the services that are there to keep them safe and supported in line with their needs".

In the event of parents/carers informing the school of their intention to remove their child from the school with a view to educating her/him at home, the school will work in partnership with the local authority, other key professionals and the parents/carers in order to consider what is in the best interests of the child, particularly when a child has SEN/D, and/or has a social worker, and/or is otherwise vulnerable. Where the child has an EHCP, the school will support the local authority and work closely with the parents/carers to review the plan.

Local issues

The local area presents several contextual safeguarding risks to children and young people. There is a heightened risk of county lines exploitation, gang activity and youth violence in Nuneaton.

In the Camp Hill area of Nuneaton, various issues have been identified, including illegal drug activity, vehicle offences, community safety concerns, and traffic congestion. Stubb's Pool, situated near the school and frequently used by pupils en route, represents a potentially vulnerable location regarding strangers and drug use. To address these issues, staff, pupils, and parents receive regular updates concerning contextual safeguarding via the parent newsletter, staff briefings, and assemblies. In instances where urgent alerts are disseminated from our safeguarding partners, this critical information is promptly communicated to parents and carers through Arbor. Additionally, Senior Leadership Team (SLT) members remain present at the school gates during drop-off and pick-up periods to monitor traffic and enhance the safeguarding of our children.

Reference Documents

Keeping Children Safe in Education (DfE 2024)

Working Together to Safeguard Children (DfE 2023)

Warwickshire Safeguarding Partnership multi-agency safeguarding procedures
https://westmidlands.procedures.org.uk/

Safeguarding Children - Information and Record Keeping (WCC Education Safeguarding Service)

What to do if You're Worried a Child is being Abused 2015 - Advice for Practitioners (HMG 2015)

Children missing education - Statutory guidance for local authorities (DfE 2016) Sharing nudes and semi-nudes – Advice for education settings working with children and young people (UK Council for Child Internet Safety 2020)