SAFEGUARDING AND CHILD PROTECTION POLICY 2026

Blessed Edward Bamber Catholic Multi Academy Trust

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Blessed Edward Bamber
Catholic Multi Academy Trust

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Previous versions

Version	Author	Date	Changes
1.1	CEO		Changes of SCCA/CTK and SMCA policies to encompass wider family of schools and LGBs. Updated information in line with Keeping Children Safe in Education 2023.
2.1	CEO	Aug 2024	Update Directors' contact details (p4) Addition of latest definition of safeguarding in line with KCSiE 2024 (p5) Amend LGS role to ensure that at least one Governor on an interview panel is safer recruitment trained (updated from every member) (5.3, p10) Amend location of 'More information regarding managing incidents of sexual violence in school' to KCSiE 2024 page 159 (and section 5 of KCSIE 2024) (p17) New sub-heading added on flexi-schooling (p22) Addition of phrase culture from 'safe space' (in line with KCSiE 2024) and a note to refer to latest government and diocesan guidance (p23) Addition of pupils required to give evidence in court to Appendix 2 – Specific safeguarding issues (p34)
3.1	CEO	Aug 2025	Section 4.3 Add non-statutory guidance employment codes and generative AI expectations links. Section 11 – Child on child abuse – added in more information on discrimination. Section 14 – Sharing videos and images – added information on AI images. Section 14- added examples of crimes under the Online Safety Act 2023. Section 16 – added kinship care to CLA and PCLA. Added more guidance on gender-questioning based on government guidance. Added Gypsy, Roma, Traveller information and link to guidance.

			Section 18 – new section on visiting speakers. Section 19 – additional guidance on managed moves and transfers. Appendix 2- added additional safeguarding issues – sextortion and spiritual / faith-based abuse. Added additional category in radicalisation section: Mixed, Unclear or Uncertain Extremism. Appendix 4 – added definition of 'Downblousing'
3.2	CEO	Oct 25	Updated names of Chair of Directors and Director for Safeguarding
3.3	CEO	Feb 26	Date of approval by Board added to version control.
4.3	CEO	Sept 26	Updated throughout in line with **KCSiE 2026** and related statutory guidance. **Section 4 – Legal Framework:** updated statutory and non-statutory guidance links, EYFS Framework, Data Protection Act 2018 references, filtering and monitoring standards, Generative AI standards, and right to work guidance. **Section 5 – Roles and Responsibilities:** added Trust consultancy support from **Ella Savell-Boss Ltd**; expanded staff safeguarding responsibilities; updated Annex reference from KCSiE. **Section 8 – Early Help:** revised vulnerability indicators to align with KCSiE 2026. **Section 9 – Categories of Abuse:** added new statutory duty to report child sexual abuse under the Crime and Policing Act 2026. **Section 11 – Child on Child Abuse:** strengthened guidance on group abuse, victim/perpetrator safeguarding and prevention. **Section 12 – Harmful Sexual Behaviours:** expanded guidance on risk and needs assessments, position of trust offences, support for alleged perpetrators, and risk assessment tools. **Section 13 – Online Safety:** added guidance on mobile phone-free schools, deepfake imagery risks, downblousing, and strengthened filtering and monitoring expectations. **Section 14 – Sharing Images:** updated guidance on AI-generated indecent imagery and NPCC guidance. **Section 15:** replaced "Context of Safeguarding Incidents" with broader **Contextual Safeguarding** section. **Section 16 – Pupils Potentially at Greater Risk of Harm:** expanded guidance on gender-questioning children, mental health, part-time timetables/flexi-schooling, kinship care and vulnerable groups. **Section 19 – Alternative Provision:** updated in line with KCSiE 2026 and AP guidance.

			Section 23 – Managing Referrals: added procedures where DSL/DDSL are unavailable and reinforced staff responsibility to act. **Sections 24–30:** updated guidance on allegations, safer recruitment, regulated activity definition, record keeping, disclosures and training requirements. **Appendix 2:** new standalone referral guidance appendix added; expanded safeguarding issues section including Operation Encompass updates, Casey Audit learning on CSE, modern slavery/human trafficking, serious youth violence, and allergies/anaphylaxis (Benedict's Law). **Appendix 4:** updated guidance on reasonable force and restrictive interventions in line with 2026 DfE guidance. **Appendix 7:** added details of safeguarding support available through Ella Savell-Boss Ltd.

This is a recommended policy for school use

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NAMED PERSONNEL WITH DESIGNATED RESPONSIBILITY FOR SAFEGUARDING AND CHILD PROTECTION WITHIN THE TRUST, SCHOOL AND LOCAL AUTHORITY:

Organisation	Position	Contact details
School Name	Designated Safeguarding Lead	Headteacher head@st-williams.lancs.sch.uk
	Deputy Designated Safeguarding Lead	Claire Higginson
	Other Designated People	Penny Houghton
Blessed Edward Bamber Catholic Multi Academy Trust	Trust Designated Safeguarding Lead	Amanda Stringer ast@bebcmat.co.uk
Blessed Edward Bamber Catholic Multi Academy Trust	Chief Executive Officer	Helen O'Neill hon@bebcmat.co.uk
Blessed Edward Bamber Catholic Multi Academy Trust	Designated Director	Liz Boniface admin@bebcmat.co.uk
Blessed Edward Bamber Catholic Multi Academy Trust	Chair of Directors	Sue Ridyard admin@bebcmat.co.uk

Key Contacts:

Organisation	Contact Details (Delete as appropriate)
Lancashire Social Care Team	**Lancashire** Daytime hours: 0300 123 6720 Out of Hours: 0300 123 6722
Children's Safeguarding Assurance Partnership (Blackpool – Lancashire – Blackburn with Darwen)	https://www.safeguardingpartnership.org.uk/
Local Authority Designated Officer (LADO)	Lancashire – lado.admin@lancashire.gov.uk 01772 536694
Diocese of Lancaster Safeguarding Team	safeguarding@lancasterrcdiocese.org.uk
Ofsted	0300 123 3152

1. INTRODUCTION

Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- *providing help and support to meet the needs of children as soon as problems emerge*

- *protecting children from maltreatment, whether that is within or outside the home, including online*
- *preventing 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*
- *taking action to enable all children to have the best outcomes.*

(Keeping Children Safe in Education 2026)

1.1 All members of the Blessed Edward Bamber Catholic Multi Academy Trust (BEBCMAT) community are committed to safeguarding as integral to all that we do when working with children and young people. All schools within the Trust accept their responsibilities and duties in relation to safeguarding and child protection issues.

1.2 Each school in the Trust takes action to promote a culture of safeguarding, works to prevent abuse from occurring, seeks to protect those at risk of being abused and responds appropriately and in a timely manner to those who need our help and support. We will work together to identify where a person may present a risk to others and take robust actions to mitigate such risks.

1.3 As staff within the Trust, we acknowledge and fully support the whole-Trust approach to safeguarding as it is the responsibility of every individual within the Trust who comes into contact with children, young people and adults – we all have a role to play.

1.4 The school recognises that promoting children's well-being and safeguarding them from significant harm depends crucially upon effective information sharing, collaboration and understanding between agencies and professionals. As staff within the school have regular contact with children, we realise that we are particularly well-placed to observe outward signs of abuse, changes in behaviour or failure to develop and it is more likely that a child may disclose to them. Parents should be aware, therefore, that where it appears to a member of staff that a child may have been abused or is in danger of abuse, the school is required by law to report their concerns to the relevant Local Authority Children and Young People's Department. Blackpool and Lancashire local authorities have clear procedures that the school supports and follows in reacting to issues of concern relating to the protection of children.

1.5 This policy applies to all adults working in or on behalf of St William's Catholic Primary School and The Blessed Edward Bamber Catholic MAT.

2. FOUNDATIONS

2.1 In developing and implementing the school and Trust safeguarding policy, we are guided by the following foundations:

- Gospel: The life of the BEBCMAT community is integral to how we are called to share the good news through the teachings of Jesus Christ. The good news speaks of welcome for all, with a particular regard for those who are most vulnerable in society, into a family of schools where the value and dignity of every human being is affirmed and those in positions of responsibility are trustworthy and work with true integrity to mission. Being faithful to our calling, being 'here to

serve', compels us to rise to the challenge of preventing abuse from happening and responding well where it has.

- Human Rights and the law: BEBCMAT and St William's Catholic Primary School recognise the personal dignity and rights of all children, young people and adults, as enshrined in the Human Rights Act 1998 and the 1989 United Nations Convention on the Rights of the Child and the Equality Act 2010. Safeguarding work is undertaken within a legislative framework supported by government guidance which sets out a range of safeguarding duties, responsibilities and best practice.

- Core principles: The following key principles underpin the school and Trust's approach to safeguarding practices – the welfare of the child/young person is paramount. We will operate with integrity, respect, transparency and accountability. We will collaborate with key statutory authorities and use professional safeguarding advice from within and outside of the trust. We will promote a culture of informed vigilance, adopting the stance 'it could happen here' and we will undertake regular audits and evaluations to ensure best practice.

2.2 Good safeguarding practice helps schools promote and maintain a safer culture which protects and promotes the welfare of children, young people and vulnerable adults. These features are:

- A leadership commitment, at all levels, to the importance of safeguarding and promoting the welfare of children and young people.
- A clear line of accountability for all safeguarding work with clarity of roles and responsibilities.
- Clear reporting procedures to deal with safeguarding concerns and allegations.
- Practice and services informed by ongoing learning, review, and by the active involvement of student voice and parent participation.
- Safer recruitment procedures in place and followed rigorously.
- Clear arrangements for support for adults involved in safeguarding.
- Comprehensive safeguarding training for all staff and volunteers working with or in contact with children, young people and their families.
- Effective working with statutory and voluntary sector partners.
- Complaints and whistleblowing procedures that are well publicised.
- Effective information sharing.
- Good record keeping.
- Regular training and / or updates.
- Thorough induction of new staff.

3. POLICY COMMITMENTS

Based on the foundations outlined above, BEBCMAT and St William's Catholic Primary School are committed to:

3.1 Promoting a safe environment and culture:
All staff and volunteers respect our children and young people. We will create and maintain environments that are safer for all, that prevent abuse, and that create nurturing and secure conditions for all. We will continue to strengthen and review these environments. This will be done through training support, communication, strong governance, and quality assurance processes. All leaders are supported to adhere to safer good working practices and to challenge any misuse of

power. Leaders ensure that clear processes are in place to ensure that children and young people are listened to and will act as advocates on behalf of children and young people and their families.

3.2 Safely recruiting and supporting those with any responsibility related to children and young people:
The Trust, school leaders and local governing bodies will select and vet all those with any responsibility related to children, young people and vulnerable adults, in accordance with the safeguarding policy and practice guidance. We will train and equip all staff and volunteers to have the confidence and skills they need to care and support children and their families and to recognise and respond to abuse. This will be done by supporting the roll-out of consistent and accessible safeguarding training in accordance with KCSiE 2026 requirements.

3.3 Responding promptly to every safeguarding concern or allegation:
Anyone who brings any safeguarding suspicion, concern, knowledge or allegation of current or non-current abuse to our notice will be responded to, respectfully and in a timely manner, in line with statutory child and adult safeguarding procedures and policies. All safeguarding actions and decisions will be recorded in line with KCSiE requirements. All suspicions, concerns, knowledge or allegations that reach the threshold for reporting to the statutory authorities, will be reported via the Designated Safeguarding Lead (DSL) to the appropriate statutory agency. This will be done irrespective of the status of the person. All staff and volunteers will cooperate with the statutory authorities in all cases. In responding to concerns or allegations of abuse relating to any adult within our schools, we will act in accordance with the requirements of criminal, civil and ecclesiastical law, and so will respect the rights and uphold the safeguards afforded in these, both to the person alleging harm and the subject of concerns or allegations

3.4 Caring pastorally for victims/survivors of abuse and other affected persons:
The Trust and school will offer care and support to all those that have been subject to abuse, regardless of the type of abuse, when or where it occurred. We are committed to continuing to learn how to respond in a supportive and healing way to the needs of those who have suffered abuse. Those who have experienced harm will receive a compassionate response, be listened to and be taken seriously. Leaders will respond to any disclosure of abuse in accordance with statutory legislation and Trust / School policy and practice guidance. This will be done in collaboration with the relevant statutory agencies in accordance with criminal, civil and ecclesiastical law. They will be offered appropriate pastoral care, counselling and support - according to the agreed need. An appropriate pastoral response will be considered, with due regard to the right of privacy of those directly involved, and to the administration of justice.

3.5 Caring pastorally for those who are the subject of concerns or allegations of abuse and other affected persons:
Leaders will endeavour to respect the rights under criminal and civil law in exercising their responsibilities relating to suspicions, concerns, knowledge or allegations of abuse. Additional assessment, therapy or support service may be offered in consultation with relevant external agencies. Leaders will ensure that steps are taken to protect others when any adult is considered a risk to children. Leaders will remain alert to the need to provide wider support to those affected.

4. LEGAL FRAMEWORK

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

4.1 Legislation

- Children Act 1989 (legislation.gov.uk)
- Children Act 2004 (legislation.gov.uk)
- Safeguarding Vulnerable Groups Act 2006 (legislation.gov.uk)
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (legislation.gov.uk)
- Sexual Offences Act 2003 (legislation.gov.uk)
- Female Genital Mutilation Act 2003 (legislation.gov.uk)
- Serious Crime Act 2015 (legislation.gov.uk)
- Apprenticeships, Skills, Children and Learning Act 2009 (legislation.gov.uk)
- Equality Act 2010 (legislation.gov.uk)
- Counter-Terrorism and Security Act 2015 (legislation.gov.uk)
- UK General Data Protection Regulation
- Data Protection Act 2018
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (legislation.gov.uk)
- Voyeurism (Offences) Act 2019 (legislation.gov.uk)
- Domestic Abuse Act 2021 (legislation.gov.uk)
- Marriage and Civil Partnership (Minimum Age) Act 2022 (legislation.gov.uk)
- HM Government Multi-agency practice guidelines: Handling cases of Forced Marriage (publishing.service.gov.uk)
- Multi-agency statutory guidance on female genital mutilation - GOV.UK (www.gov.uk)

4.2 Statutory guidance:

- HM Government Multi-agency practice guidelines: Handling cases of Forced Marriage (publishing.service.gov.uk)
- Multi-agency statutory guidance on female genital mutilation - GOV.UK (www.gov.uk)
- Channel and Prevent Multi-Agency Panel (PMAP) guidance - GOV.UK (www.gov.uk)
- Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism (publishing.service.gov.uk)
- Prevent duty guidance - GOV.UK (www.gov.uk)

- EYFS Statutory Framework
- Disqualification under the Childcare Act 2006 - GOV.UK (www.gov.uk)
- Alternative provision - GOV.UK (www.gov.uk)
- Supporting pupils with medical conditions at school - GOV.UK (www.gov.uk)

4.3 Non-statutory guidance:

- Information sharing advice for safeguarding practitioners - GOV.UK (www.gov.uk)
- Child exploitation disruption toolkit - GOV.UK (www.gov.uk)
- Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK (www.gov.uk)
- ICO Employment Practice and Data Protection
- Recruit teachers from overseas - GOV.UK (www.gov.uk)
- Virginity testing and hymenoplasty: multi-agency guidance - GOV.UK (www.gov.uk)
- Working together to improve school attendance - GOV.UK (www.gov.uk)
- Meeting digital and technology standards in schools and colleges -
- Keeping children safe in out-of-school settings - GOV.UK (www.gov.uk)
- Promoting and supporting mental health and wellbeing in schools and colleges - GOV.UK (www.gov.uk)
- Mental health and behaviour in schools (publishing.service.gov.uk)
- Right to work checks: an employer's guide
- https://www.gov.uk/guidance/plan-technology-for-your-school
- Generative AI: product safety standards

4.4 This policy operates in conjunction with the following school policies as applicable:

- Children Missing Education Policy
- Child Sexual Exploitation (CSE) Policy
- Prevent Duty Policy
- Child-on-child Abuse Policy / Anti-Bullying Policy
- Behaviour / Exclusion Policy
- Online Safety Policy (including filtering and monitoring)
- Staff Behaviour / Code of Conduct policy
- Social Media Policy
- Use of School Devices Policy

- School Trips and Visits Policy
- Safer Recruitment Policy
- Looked After Children's Policy
- Whistleblowing Policy
- Allegations of Abuse Against Staff Policy
- Photography Policy
- Attendance Policy
- Home Visits Policy
- Data Protection Policy
- Lockdown / Critical Incident Policy
- Trust Safeguarding Policy

5. ROLES AND RESPONSIBILITIES

5.1 Designated Safeguarding Lead

The DSL is a member of the school's senior leadership team. The DSL takes lead responsibility for child protection and wider safeguarding. Please refer to Annex B of KCSiE for a full description of the DSL's responsibilities. In the absence of the DSL, the Deputy DSL will provide appropriate cover. All deputies are trained to the same standard as the designated safeguarding lead and the role is explicit in their job description. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection remains with the DSL, this lead responsibility is not delegated.

The DSL or DDSL will be available during school hours for staff to discuss any safeguarding concerns. Out of term cover is contractual in some settings and additionally email advice can be sought from the Trust Safeguarding Lead or the CEO.

Please note: The Trust have a contract with Ella Savell-Boss Ltd. - A safeguarding training and consultancy provider. This contract is provided to support all schools in the Trust and one aspect of the support provided is telephone consultation. This means that if the DSL or a deputy are not available, any member of staff can contact them for advice, support or a second opinion. Further details of this service are outlined in appendix 6.

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

- Provide advice and support to other staff on child welfare and child protection matters.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- Contribute to the assessment of children.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police).
- Support staff who make such referrals directly.

Where the DSL is not the Headteacher, the DSL within each school setting will keep the Headteacher informed of any issues and liaise with LA case managers and designated officers for child protection concerns as appropriate.

The full responsibility of the DSL is set out in their job description. The DSL will lead with active casework, maintain meticulous records, track trends, report the safeguarding picture to key stakeholders and drive a climate of continuous improvement to keep all members of the school safe

and well. The DSL will have responsibility for managing the safeguarding training process for staff, ensuring that all school staff and Governors receive regular and appropriate safeguarding training.

5.2 Governors

The Local Governing Body (LGB) have strategic leadership responsibility for the school's safeguarding arrangements and must ensure that they comply with their duties under legislation. The Local Governing Body ensures that school adopts a whole school approach to safeguarding. In addition:

- There will be a safeguarding update within each headteacher's report
- The DSL will provide an update for governors at relevant meetings
- The Governors undertake an annual review of the Safeguarding and Child Protection Policy.
- The Chair of Governors will immediately liaise with the LADO regarding any allegation made against the Headteacher.
- Support the BEBCMAT safer recruitment procedure.
- All governors will read updated legislation and guidance including KCSiE.
- The Local Governing Body will make every effort to ensure the child's wishes and feelings are considered when determining what action to take and which services to provide should there be a safeguarding concern, through effective quality assurance and challenge.

5.3 Lead Governor for Safeguarding

All BEBCMAT schools have a Lead Governor for Safeguarding (LGS) who has received training in Safeguarding and Child Protection for Governors. The LGS will ensure that at least one member of the Local Governing Body who sits on interview panels has completed Safer Recruitment Training. The LGS works closely with the Head teacher and DSL to promote safeguarding. The role of the Lead Governor for Safeguarding includes the following duties:

- Together with the Headteacher, the Lead Governor for Safeguarding and DSL undertakes an annual review of the school's Safeguarding and Child Protection procedures and of the efficiency with which the related duties have been discharged to ensure that the school is safeguarding and promoting the welfare of pupils.
- Works with the DSL on safeguarding policies to be presented to the Local Governing Body.
- Works with the DSL to ensure that appropriate filtering and monitoring systems are in place and oversees the (at least) annual review of these systems to ensure any deficiencies or weaknesses are remedied without delay.
- Together with the LGB, approve amendments to Safeguarding and Child Protection arrangements in the light of changing regulations or recommended best practice at least annually.
- Meet with the DSL regularly to discuss safeguarding matters.

5.4 Board of Directors

The Board of Directors ensures that the Trust has effective policies and procedures in place and monitors each school's compliance with them. The Board ensures that a senior member of each school's leadership team is designated to take lead responsibility for child protection and the Prevent Strategy and ensures that staff undertake appropriate training.

The Board of Directors ensures that the Trust has a nominated director responsible for child protection, including the Prevent Strategy. The Board will remedy, without delay, any deficiencies or weaknesses regarding child protection and Prevent arrangements. The Board seeks assurance that, where services or activities are provided on Trust premises by another body, that the body concerned has appropriate policies and procedures in place in regard to safeguarding children, child protection and Prevent duties. They will liaise with the relevant school on these matters where appropriate.

The Board of Directors will nominate a director or executive leader to be responsible for liaising with the Local Authority and/or partner agencies and Chair of the LGB in the event of allegations of abuse being made against the Headteacher.

The Trust Board will review its policies and procedures annually.

5.5 Headteacher

The Headteacher is responsible for all safeguarding concerns involving the school. Key responsibilities of the Headteacher include the following:

- The Headteacher is responsible for appointing the DSL in accordance with the scheme of delegation.
- The Headteacher is responsible for overseeing the communication with the LADO relating to any accusation made against any member of staff or volunteer (inc. supply teachers and third-party agency staff) in accordance with LA and school procedures.
- The Headteacher will act as a 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate, in line with policy.
- The Headteacher is responsible for liaising with the LADO and other relevant safeguarding partners with regard to any historic safeguarding concerns.
- The Headteacher will ensure that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- The Headteacher (via the DSL) is responsible for ensuring that all staff and volunteers have received appropriate safeguarding training and that this training is up to date and a record is kept.
- The Headteacher, together with the DSL, is responsible for appropriately supporting, in line with legislation, all children and staff when abuse occurs, or allegations of abuse are made.
- Ensuring the relevant staffing ratios are met, where applicable in EYFS.
- Making sure each child in the EYFS is assigned a key person.

5.6 Designated Teacher

The designated teacher has responsibility for promoting the educational achievement of CLA (Children Looked After) and previously CLA (PCLA), and for children who have left care through

adoption, special guardianship, kinship care arrangements, or child arrangement orders or who were adopted from state care outside England and Wales. More information regarding the role of the Designated Teacher can be found in the Looked After Children Policy.

5.7 All Staff

Safeguarding is a fundamental part of each person's role within school. Staff will promptly report safeguarding concerns, in line with school procedures and ensure policies and guidance are followed as directed by the DSL.

Staff will:

- Use their professional curiosity to spot signs and indicators of abuse, neglect and exploitation, reporting these to the DSL and understanding that early intervention is vital.
- Ensure they listen to the pupil when disclosures are made, and report concerns accurately, always following the school safeguarding procedures.
- Actively participate in regular safeguarding training and safeguarding updates.
- Actively and swiftly participate when tasked by the DSL to take safeguarding actions that are within their role or provide updates.
- Read and understand all policies and procedures relating to safeguarding and seek clarification as required.
- Report concerns about members of staff in line with school procedures (see appendix 1).
- Work within a culture of vigilance and adopt a mindset of "It could happen here."

6. MULTI AGENCY WORKING

6.1 BEBCMAT contributes to multi-agency working as part of its statutory duty. Each school will follow the local safeguarding arrangements within their Local Authority.

6.2 BEBCMAT and the school will be fully engaged, involved, and included in local safeguarding arrangements. The Trust follows its statutory duty to cooperate with LA published arrangements in the same way as other relevant agencies.

6.3 BEBCMAT will work with CSC, the police, health services and other services to protect the welfare of its pupils, through the early help process and by contributing to multi-agency plans to provide additional support.

6.4 Where a need for early help is identified, the Trust will allow the CSC within the relevant LA to conduct (or consider whether to conduct) a Section 17 assessment or Section 47 Enquiry under the Children Act 1989. A section 17 assessment gathers all important information about all children living in a household and their family to assess need and risk. A Section 47 Enquiry might also be referred to a Child Protection Enquiry, carried out to assess if there is the risk of significant harm to the child. The Trust also recognises the particular importance of inter-agency working in identifying and preventing CSE.

7. INFORMATION SHARING

7.1 BEBCMAT and the school recognise the importance of proactive information sharing between professionals and local agencies to effectively meet pupils' needs and identify any need for early help.

7.2 Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – **data protection regulations do not act as a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.**

7.3 Staff members will ensure that fear of sharing information does not over-ride their responsibility to promote the welfare and safety of pupils. If staff members are in doubt about sharing information, they must speak to the DSL or deputy DSL/s.

8. EARLY HELP

8.1 Early help enables the provision of support as soon as a problem emerges, at any point in a child's life. Any pupil may benefit from Early help, although staff will be alert to the potential need for early help for pupils who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- is a young carer
- is pregnant and/or is a parent themselves
- has exhibited early signs of abusive, violent and/or harmful sexual behaviours
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
- is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- is at risk of being radicalised into terrorism
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of faith-based abuse or so-called "honour"-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child
- has a mental health need

8.2 The DSL will take the lead where Early help is appropriate. This can be offered through universal services and community-based early help (including support based in school) or a referral can be made to the targeted early help level of Family Help.

8.3 Staff may be required to support other agencies and professionals in an Early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and

consideration given to a referral to CSC for assessment for statutory services if the pupil's situation is not improving or is worsening.

9. CATEGORIES OF ABUSE

How do I know a child or young person is being abused?

Child abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in a school setting by those known to them or by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children. The term *'child'* is used to include all children and young people who have not yet reached their 18th birthday.

Child abuse is categorised as:

Physical abuse

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

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (e.g. rape or oral sex), or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. Sexual abuse includes non-contact activities, such as involving children in looking at, including online and with mobile phones, or in the production of pornographic materials, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. In addition, sexual abuse includes abuse of children through sexual exploitation.

Mandatory Duty to report CSA

In April 2026 the Crime and Policing bill received Royal Assent to become the Crime and Policing Act 2026.

It introduces a new statutory duty for individuals working in regulated activity (e.g. teachers, social workers, healthcare professionals and those working in voluntary roles with children) to report sexual abuse when they are made aware of it. It therefore means not doing so would be in breach of the law. It also includes a new criminal offence of attempting to prevent someone reporting child sexual abuse (CSA).

The duty requires staff to make a report if they:

- are told about CSA, either by a child or an adult involved
- witness CSA in person
- see or hear it in the form of images, videos or audio recordings.

Our school's process

- At our school, all staff are trained to understand what constitutes child sexual abuse (including non-contact sexual abuse and/or online abuse).

- Staff would then need to report to Children's Services and the police directly. However, our expectation would be that they would be supported to do so by the DSL.

- Staff should therefore make the DSL aware immediately if they need to report. However, they should **not** seek the DSL's **permission** to make the report, nor should they delay in reporting in order to speak to the DSL first.

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child, such as to cause severe and persistent effects on the child's emotional development, and may involve:

- Conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- Imposing age or developmentally inappropriate expectations on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction; (See the UK government guidance Working Together to Safeguard Children 2026)
- Seeing or hearing the ill-treatment of another, e.g. where there is domestic violence and abuse.
- Serious bullying, causing children to frequently feel frightened or in danger.
- Exploiting and corrupting children.
- Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs and is likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse, maternal mental ill health, learning difficulties or a cluster of such issues. Where there is domestic abuse and violence towards a carer, the needs of the child may be neglected. Once a child is born, neglect may involve a parent failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment).
- Protect a child from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate caregivers).
- Ensure access to appropriate medical care or treatment.

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

Included in the four categories of child abuse and neglect above are a number of factors relating to the behaviour of the parents and carers which have a significant impact on children, such as domestic violence. Research analysing Child Safeguarding Practice Reviews (previously referred to as serious case reviews) has demonstrated a significant prevalence of domestic abuse in the history of families with children who are subject to statutory child protection plans. (Child KN 15 Cath Connor

Nottingham Safeguarding Children's Board 2019; Child K Karen Tudor Wiltshire Safeguarding Children's Board 2019).

Children can be affected by seeing, hearing and living with domestic abuse, as well as by being caught up in any incidents directly, whether to protect someone or as a target. It should also be noted that the age group of 16- and 17-year-olds has been found in recent studies to be increasingly affected by domestic violence in their peer relationships (peer relationship patterns and their association with types of child abuse and adolescent risk behaviours among youth at risk of maltreatment - D Yoon 2020.)

10.SPECIFIC SAFEGUARDING ISSUES

There are certain specific safeguarding issues that can put children at risk of harm – staff should be made aware of these issues, and these should form the basis of regular refresher training. Appendix 2 of this policy sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to these issues.

11.CHILD ON CHILD ABUSE

KCSiE defines child-on-child abuse as abuse between children. The school has a zero-tolerance approach to abuse and all forms of discrimination, including child-on-child abuse. All staff will be aware that child-on-child abuse can occur between pupils of any age and gender, both inside and outside of school, as well as online. One child may abuser a group of children, or a group of children may abuse a single child.

All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. In fact, schools must assume it is happening and ensure pupils are aware of how to report incidents of child-on-child abuse.

All staff will speak to the DSL if they have any concerns about child-on-child abuse. All staff will understand the importance of challenging inappropriate behaviour between pupils and will not tolerate abuse as "banter" or "part of growing up". Child-on-child abuse can be manifested in many ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers – sometimes known as 'teenage relationship abuse'.
- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse or bystanding.
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Up-skirting.
- Initiation- and hazing-type violence and rituals, which can 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.
- Bystanding – although not taking part in the bullying, may show the perpetrator that they support them by being there.

- Cyber-bullying including but not limited to name calling using social media and other online platforms, creating groups where abuse takes place, sharing inappropriate material about someone without their consent, creating videos of gifs about someone that all parties would identify with that person, even if they are not named directly, and using social media platforms such as TikTok, Instagram and Snapchat to exclude or talk about someone in their absence.
- Exclusion – where someone is deliberately excluded or ostracised from a group.
- All forms of discrimination and identity-based harm including (but not limited to) racism, misogyny, misandry, homophobia, biphobia and transphobia and ableism.
- It is vital for staff to understand that it is a safeguarding issue for both victim/s and alleged perpetrator/s and it is preventable. Furthermore, it is a myth that child-on-child abuse is less serious than abuse perpetrated by an adult/s towards a child. In fact, it may involve serious physical harm or threats involving weapons.

All staff will understand the importance of challenging inappropriate behaviour between pupils and will not tolerate abuse as "banter" or "part of growing up".

All staff will be fully conversant with the school's policy and procedures in respect of child-on-child abuse and the role they have in preventing it and responding where they consider a child might be at risk.

Pupils will be empowered to raise concerns or make a report. Pupils will also be reassured that they will be taken seriously, be supported, and kept safe.

The school will maintain accurate records in respect of child-on-child abuse that can enable statistical analysis against protected characteristics for example, age, disability, gender reassignment, race, religion, sex and sexual orientation.

The school's procedures for managing allegations of child-on-child abuse are outlined in the school's Anti-Bullying Policy. Staff will follow these procedures, in addition to the procedures outlined in the school's Suspension and Exclusion Policy, where appropriate.

12. HARMFUL SEXUAL BEHAVIOURS

Context

Children who display harmful behaviour and children affected by harmful behaviour

First and foremost, it is crucial that everyone within school recognises that sexually harmful behaviour happens in schools. Staff need to adopt the view "it could happen here". To this effect, safeguarding training will be provided for all members of the school community, to promote a diligent safeguarding culture in which such situations receive a swift, proportionate and timely response that meets the needs of all affected.

There are many ways to describe children who have been subjected to sexual violence and/or sexual harassment and many ways to describe those who are alleged to have caused harm by their behaviour. It is important that school staff recognise that not everyone who has been subjected to sexual violence and/or sexual harassment considers themselves a 'victim' or would want to be described in this way.

Ultimately, school staff should be conscious of this when managing any incident and be prepared to use any term with which the individual child is most comfortable. For this advice, we use the term 'children displaying harmful behaviour'. It is important to remember that, as a child, any child

displaying harmful behaviour is entitled to, deserving of, and should be provided with, a different level of support to that which might be provided to an adult who is alleged to have abused a child.

What is sexual harassment and sexual violence?

Responsibilities

Schools have a statutory duty to safeguard and promote the welfare of the children. As part of this duty school staff are required to have regard to KCSiE. BEBCMAT schools are required by law to have a behaviour policy and measures in place to prevent all forms of bullying and provide relationship education. Our schools play an important role in preventative education. Good practice is that which allows children an open forum to talk things through and all staff should be aware of how to support children and how to manage a disclosure.

Schools should have in place a meaningful and expert led RSHE curriculum which allows for open and honest discussions about relationships.

Responding

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Some situations are clear:

- 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.
- Rape, assault by penetration and sexual assault are defined in law.
- Creating and sharing sexual photos and videos of under-18s is illegal (often referred to as sexting). This includes children making and sharing sexual images and videos of themselves.
- Under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a pupil under 18 may be a criminal offence, even if that pupil is over the age of consent.

Schools are not alone in dealing with sexual violence and sexual harassment; statutory partners such as CSC and the police may need to become involved in some cases. It is likely that any issues will extend beyond school. Online issues and the use of various social media platforms can extend the impact of the abuse. This is also the case for children using public transport and school transport.

School leaders still have a duty to respond to all incidents they are made aware of. Even if the child has not reported directly, the school's duty to promote the welfare of children and young people remains the same i.e. that friends/peers have shared their concerns to school. It is essential that children are reassured that they are being taken seriously and will be supported and kept safe as far as is possible. A child who has been affected by abuse should never be given the impression they are creating a problem, nor should they be made to feel ashamed for making a report.

Practitioners should:

- Not promise confidentiality.
- Inform the child of the next steps.
- Be supportive and respectful.

- Be non-judgemental, listen to what the child is saying to you.
- Never ask leading questions, use open questioning.
- Record the disclosure under the appropriate heading for data purposes (devote time to listening to what the child is saying, write notes if it is appropriate) and use the exact words the child spoke.
- Only record the facts as the child presents them. Opinions should be labelled correctly in the report.
- Inform the DSL immediately.

When to inform the child who is the subject of an allegation will be a decision that should be carefully considered. Where a report is going to be made to CSC and/or the police, then, as a general rule, the school DSL should speak to the relevant agency and discuss next steps and how the child who is the subject of an allegation will be informed of the allegations. The DSL should consider the following: -

- Parents or carers should usually be informed (unless this would put a child at greater risk).
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger or has been harmed a referral should be made to children's social care.
  Rape, assault by penetration and sexual assaults are crimes and must be reported to the Police. If the DSL is not available, then it is school staff's responsibility to contact the Police and CSC. Leaving school without sharing information is not an option.

When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis.

Risk assessments will be recorded (paper or electronic) and will be kept under regular review. At all times, the school will be actively considering the risks posed to all their pupils and students and put adequate measures in place to protect them.

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 risk assessment mentioned above is not intended to replace the detailed assessments of expert professionals. Any such professional assessments would therefore be used to inform the school approach to supporting and protecting our pupils and students and updating our own risk assessment.

Please note: It is not the role of the school to provide legal advice or support to victims, alleged perpetrators or parents in respect of a criminal justice process. Rather, we take our own position and responsibilities seriously and act accordingly.

The risk and needs assessment for a report of sexual violence will consider:

- the victim, especially their protection and support
- whether there may have been other victims
- the alleged perpetrator(s) intra familial harms and any necessary support for siblings (both of victim/s and alleged perpetrator/s) following incidents
- all the other children, (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms, and
- The time and location of the incident, and any action required to make the location safer.

Considering the perpetrator/s:

The alleged perpetrator is likely to have considerable unmet needs as well as posing a significant risk of harm to other children. Evidence suggests that such children may have suffered considerable disruption in their lives, may have witnessed or been subjected to physical or sexual abuse may have problems in their educational development and may have committed other offences. They may therefore be suffering, or at risk of suffering significant harm and in need of protection. Any long-term plan to reduce the risk posed by the alleged perpetrator must address their needs.

Tools that can help us to risk assess include:

- the Brook Traffic Light Tool https://www.brook.org.uk/ourwork/category/sexual-behaviours-traffic-light-tool
- Finkelhor and Wolak's typology (of sexting incidents), which can be found in the UKCIS document: https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-how-to-respond-to-an-incident-overview
- Hackett's Continuum (for cases involving Harmful Sexualised Behaviour) - https://learning.nspcc.org.uk/child-abuse-and-neglect/harmful-sexual-behaviour/understanding

Key school staff should be mindful of any police bail conditions. However, they should act independently. For example, when bail conditions lapses, this should not be an automatic indication that the level of risk has decreased.

More information regarding managing incidents of sexual violence in school can be found in Part 5 of KCSiE 2026.

Supporting Young People through Criminal Cases

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, school leaders should be aware of anonymity, witness support and the criminal process in general so they can offer support and act appropriately. An 'appropriate adult' is required to support the child during any formal statutory interview process.

In addition to the legal protections, as a matter of effective safeguarding practice, school leaders should do all they reasonably can to protect the anonymity of any child 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 should know about the report and any support that will be in place for the children involved. School leaders should also consider the potential impact of social media in facilitating the spreading of rumours and exposing children's identities.

Thresholds

In some cases of sexual harassment, for example one-off incidents, school leaders may take the view that the children concerned are not in need of statutory intervention and that it would be appropriate to handle the incident internally, perhaps through utilising their behaviour and bullying policies and by providing pastoral support. Advice should be sought in these situations from the Trust.

All concerns, discussions, decisions and rationale should be recorded electronically on the school's safeguarding system and always discussed with the DSL. School leaders may decide that the children involved do not require statutory interventions but may benefit from an Early help assessment. Therefore, all relevant parties can assemble to review actions and have a clear action plan to support the pupils involved.

Where a child has been harmed, is at risk of harm, or is in immediate danger, the DSL should make a referral to local CSC. In some cases, CSC will review the evidence and decide a statutory intervention is not appropriate. The DSL should be prepared to refer again if they believe the child remains in immediate danger or at risk of harm. If you do not receive a satisfactory response, please contact the Trust who can intervene to offer support. If a statutory assessment is not appropriate, the DSL should consider how best to support the pupils involved such as, specialist support and pastoral support.

Where a report of rape, assault by penetration or sexual assault is made, the starting point is this must be passed on to the police. If a child is convicted or receives a caution for a sexual offence, the school leaders should update the risk assessment, ensure relevant protections are in place for all the children at the school and, if it has not already, and consider any suitable action in light of their behaviour policy. If the child accused remains in the same school as the child alleging harm, the school leaders should be very clear as to their expectations regarding the child who has been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions the school leaders consider to be reasonable and proportionate with regard to the child's timetable.

Ongoing responses

School staff should consider the age, and the developmental stage of the child affected by the behaviour, the nature of the allegations and the potential risk of further abuse. Staff should be aware that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the parties. Consider the proportionality of the response. Support should be tailored on a case-by case basis.

The support required regarding a one-off incident of sexualised name calling is likely to be vastly different from that for a report of rape. Children who have been affected by harmful behaviour may not disclose the whole picture immediately. They may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. When it is clear that ongoing support will be required, school staff should ask the child who has been affected if they would find it helpful to have a designated trusted adult (for example their class teacher, form tutor or DSL) to talk to about their needs.

The choice of any such adult should be the child's. School staff should respect and support this choice and support the trusted adult to support the child. If required, school staff should provide a physical space for the child to withdraw and additional time to facilitate meetings. As with any other safeguarding concern, care should be given to the transfer of information and the wider social issues such as the involvement of the wider family network and the risk of confidential information being shared on social media.

It is also important to recognise that harmful sexual behaviour between children can have a wider impact. The person receiving the information might have experienced trauma in the past and could be affected by dealing with the situation. Consider pastoral support/counselling for any staff

involved as part of the risk assessment process, recognising the duty of care owed to staff and volunteers within your school.

13. ONLINE SAFETY, FILTERING AND MONITORING AND PERSONAL ELECTRONIC DEVICES

The school will adhere to the Online Safety Policy at all times.

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

Through training, all staff members will be made aware of:

- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a pupil's online behaviour.
- The procedures to follow if a pupil attempts to access content on school devices which is known to be banned or identified by the filtering systems.

The school will ensure that suitable filtering and monitoring systems are in place on ICT equipment to prevent children accessing inappropriate material, in accordance with the school's Data and Cyber-security Breach Prevention and Management Plan. The school will be working towards meeting the governments guidance on Meeting Digital and Technology Standards in Schools and Colleges: https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges

The school will ensure that filtering and monitoring systems do not cause over blocking, which may cause unreasonable restrictions as to what people can be taught online. The DSL and Lead Governor for Safeguarding will monitor and regularly review these arrangements in line with KCSiE requirements.

All staff should be clear on:

The expectations, applicable roles and responsibilities in relation to filtering and monitoring as part of their safeguarding training. For example, part of their role may be to monitor the content on pupils' screens. Staff must be aware and be able to articulate the software used by their school to filter and monitor content.

Staff must report safeguarding concerns if:

- They witness or suspect unsuitable material has been accessed.
- The pupils are able to access unsuitable material.
- They are teaching topics that could create unusual activity on the filtering logs.
- There is failure in the software or abuse of the system.
- There are perceived unreasonable restrictions that affect teaching and learning or administrative tasks (i.e. "over blocking")
- They notice abbreviations, slang terms, words in other languages or misspellings that allow access to restricted materials.

School leaders should:

- Identify and assign roles and responsibilities to manage filtering and monitoring systems.
- Review filtering and monitoring provision at least annually.
- Block harmful and inappropriate content without unreasonably impacting teaching and learning.
- Have effective monitoring strategies in place that meets safeguarding needs.

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

Communicating with parents

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

The school will use face to face opportunities to offer training to parents on how to keep their child safe online, as well as sharing key advice and information. The school and curriculum areas will make it clear to parents what their children are being asked to do online for school and the risks associated with that.

Reviewing online safety

School leaders should carry out an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risk faced by pupils. This will include an annual review of filtering and monitoring systems. Filtering and monitoring systems will also be audited if there is:

- A serious breach of the school systems
- A change of provider.

Personal electronic devices

The use of personal electronic devices, including mobile phones and cameras, by staff only (please see below) is closely monitored by the school, in accordance with the school's own policies and procedures.

In line with the legal changes made in 2026, all schools should be mobile phone-free environments by default; anything other than this should be by exception only.

You can read our Mobile Device policy here: St William's Catholic Primary School - Policies

Our policy outlines the fact that pupils should not have access to their mobile phone (or similar device such as a smart watch) throughout the school day including during lessons, the time between lessons, breaktimes and lunchtime. The policy also outlines any circumstances which would be considered "exceptional", as well as how any breaches of the policy will be managed.

Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the school's Data Protection Policy and Photography Policy. The DPO will oversee the planning of any events where photographs and videos will be taken.

Where photographs and videos will involve pupils who are CLA, adopted pupils, or pupils for whom there are security concerns, the Headteacher will liaise with the DSL to determine the steps involved. The DSL will, in known cases of pupils who are CLA or who have been adopted, liaise with

the pupils' social workers, carers or adoptive parents to assess the needs and risks associated with the pupils.

Please note, with the prevalence of deepfake CSA images, sometimes created using images shared online, increasingly some settings are moving away from using any real images, rather using stock photography or AI-generated images of children. While we have chosen not to do this currently, we have moved towards a policy of using images of children sparingly and increasingly sharing images of pupil's work or a classroom scene rather than images of particular children. As technology develops and new dangers emerge, we will engage in dynamic and formal risk assessing, weighing up the pros and cons of sharing images of our school life. As always, the children's safety and wellbeing are our top priority.

Staff will report any concerns about pupils' or other staff members' use of personal electronic devices to the DSL, following the school's procedures, including breaches of the ban on mobile devices for pupils.

Staff will be made aware of the challenges that social media presents in the education sector. They will be given advice as to how to manage their own social media profiles safely and given training on school rules and expectations regarding social media.

Up-skirting

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of Up-skirting. "Operating equipment" includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion-activated camera.

Similarly, Downblousing' refers to the using of a mobile camera or camera to take photos down one's blouse, shirt, or dress. This is usually done without the person's knowledge or consent.

Up-skirting and downblousing will not be tolerated by the school. Any incidents will be reported to the DSL, who will then decide on the next steps to take. These next steps are highly likely to include police involvement as both upskirting and downblousing are illegal, no matter the age of the victim. Furthermore however, any such images of children would constitute indecent images of a child.

14. CONSENSUAL AND NON-CONSENSUAL SHARING OF INDECENT IMAGES AND VIDEOS

The school will ensure that staff are aware to treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos as a safeguarding concern.

Please note – the images and/or videos may be AI-assisted, deepfake imagery or pseudo-images and should be taken as seriously as other nude and semi-nude images. Such images are illegal.

Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful. Staff will follow school guidance (https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-how-to-respond-to-an-incident-overview) in dealing with instances of sharing nudes and semi nudes in the school community.

This includes understanding motivations, assessing risks posed to pupils depicted in the images and how to report this to the DSL. Staff will be given advice on how to remove the image from the internet and prevent further sharing.

Staff will be made aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; or created using AI. However, staff will ensure that pupils are not unnecessarily criminalised. The NPCC Guidance can help in these situations: https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/2020/when-to-call-the-police--guidance-for-schools-and-colleges.pdf.

The following practices are now specific offences under the Online Safety Act 2023 and therefore, all staff will be made aware of this and of their duty to pass on reports of incidents of this kind to their DSL:

- Cyberflashing
- Threatening communications (e.g., of death or serious injury)
- Epilepsy trolling
- Encouraging serious self-harm
- Sharing (or threatening to share) intimate images including deepfake images.

More information regarding this can be found in UKCIS guidance Sharing Nudes and Semi-Nudes: Advice for Education Settings Working with Children and Young People.

Where a member of staff becomes aware of an incidence of sharing nudes and semi-nudes, they will refer this to the DSL as soon as possible. They must not under any circumstances view the image themselves. They should take possession of the device and refer to the DSL who will follow their school safeguarding procedures.

15.CONTEXTUAL SAFEGUARDING

The school is aware that children and young people can face many harms within the family home or within the family unit. This tends to be referred to as 'Intrafamilial harms' and is traditionally how safeguarding was viewed. However, this does not take into account the various and increasing harms facing children outside of the family home/unit. These can be referred to as 'Contextual Safeguarding Risks', part of which are 'extra-familial harms'.

It is recognised that as children become older, they are more likely to be affected by the behaviour and attitudes of their peers, rather than their family members. The term 'extra-familial harm' refers to all harm facing children outside of the family home or unit. This can include risks facing them within their own intimate relationships or with their peers.

In terms of primary settings, these contextual safeguarding risks may be also to do with the risks facing older siblings and family members. These risks may then impact upon the younger, primary-age child.

Therefore, at our school, the DSL works closely with other local organisations including the police, school health nurses, community leaders and other academies to share safeguarding information that will help to safeguard children and young people. Additional information is available on the Contextual Safeguarding Network website:www.contextualsafeguarding.org.uk

Examples of contextual safeguarding issues include (but are not limited to):

- Crime within the local area
- Criminal gang affiliation
- Knife crime
- Child-on-child abuse within the school (see below for further information)
- Online grooming
- Online gambling

All staff, particularly the DSL and deputy DSLs, will know and understand the context of the school and where external safeguarding factors will occur. Staff should always consider the context of safeguarding incidents. Assessment of pupils' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. The school will provide as much contextual information as possible when making a referral to CSC.

16.PUPILS POTENTIALLY AT GREATER RISK OF HARM

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

Pupils who need social workers or are open to early help

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

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

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

Electively home educated pupils

Parents may choose elective home education (EHE) for their children. This can pose additional safeguarding concerns if a pupil is not visible. All staff should be aware of the additional concerns associated with a child being withdrawn for elective home education. These concerns include: the risk of modern slavery and child criminal/sexual exploitation. School staff should not remove a child from their roll unless they have written permission from the LA, to enable them to have appropriate safeguarding and due diligence measures in place. If a child is within the Social Care system, the social worker should be informed immediately. If a child has SEND needs, is vulnerable or who has a social worker, there should be a meeting called immediately. If not already in place, an EHA should be completed.

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

Flexi-schooling and part-time timetables

Any school which enters into a flexi-schooling agreement with parents must ensure that they follow the relevant guidance ensuring that children are safeguarded whilst away from school.

A flexi-schooling agreement is at the discretion of the Trust as the Admissions Authority and will only be offered in exceptional cases after thorough consideration by governors, the Headteacher and the Trust and other stakeholders (e.g. the Local Authority). All part-time timetables must be arranged in line with the guidance in Working Together to Improve School Attendance: https://assets.publishing.service.gov.uk/media/6a4f9ec6a6586e258d371bd0/Working_together_to_improve_school_attendance_2026.pdf

This guidance includes (but is not limited to):

A part-time timetable should:

• Have the agreement of both the school and the parent the pupil normally lives with.

• Have a clear ambition and be part of the pupil's wider support, health care or reintegration plan.

• Have regular review dates which include the pupil and their parents to ensure it is only in place for the shortest time necessary.

• Have a proposed end date that takes into account the circumstances of the pupil, after which the pupil is expected to attend full-time, either at school or alternative provision. It can, however, be extended as part of the regular review process. In some limited cases, a pupil with a long-term health condition may require a parttime timetable for a prolonged period.

Children absent from education

Children who miss long periods of school are at greater risk of harm. All staff should be aware of any child who is deemed to be persistently absent or severely absent. There should be processes in place to ensure safeguarding is effective when off-site. This should be through the use of home visits and regular meetings to assist in the child returning to full time education. Further information regarding this can be found in the school's attendance policy and Working Together to Improve School Attendance.

CLA and PCLA

Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. PLAC, also known as care leavers, can also remain vulnerable after leaving care. The school should be knowledgeable about trauma informed behaviours when making decisions to support pupils who fall under this bracket.

School leaders will ensure that staff have the knowledge, skills and understanding to keep CLA (including those in kinship care) and PCLA safe. This includes ensuring that the appropriate staff have the information they need, e.g.

- Looked after legal status e.g. whether a child is looked after under voluntary arrangements (section 20) with consent of parents, or an interim or full care order.

- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the pupil.

The DSL/Designated Teacher will be provided with the necessary details of pupils' social workers and the VSH and for PLAC, personal advisers. This should be easily accessible and on the school MIS system.

Further details of safeguarding procedures for LAC and PLAC are outlined in the school's/ LA LAC policy.

Pupils with SEND

When managing safeguarding in relation to pupils with SEND, staff will be aware of the following:

- Certain indicators of abuse, such as behaviour changes and injury may relate to the pupil's disability without further exploration; however, it should never be assumed that a pupil's indicators relate only to their disability.
- Pupils with SEND can be disproportionally impacted by issues such as bullying, without outwardly showing any signs. More information can be found in the school's anti-bullying/child-on-child abuse policy.
- Communication barriers may exist, as well as difficulties in overcoming these barriers. This may impact on the child's ability to report concerns.
- Children with SEND may have more difficulty in understanding how to keep themselves safe. More consideration must be given to the teaching of safeguarding with this group of pupils.

When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue, relating to a pupil with SEND, the DSL will liaise with the school's SENDCo, as well as the pupil's parents where appropriate, to ensure that the pupil's needs are met effectively.

LGBTQ+ Pupils

The fact that a pupil may be LGBTQ+ is not in itself an inherent risk factor for harm, however, staff will be aware that LGBTQ+ pupils can be targeted by other individuals.

Staff will also be aware that, in some cases, a pupil who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as pupils who identify as LGBTQ+.

KCSiE recognises that the risks to these pupils can be compounded when they do not have a trusted adult with whom they can speak openly with. Best practice should include provision for a named teacher within school to help reduce the additional barriers faced and create a culture where they can speak out and share any concerns they have with members of staff.

Children who are Questioning their Gender

In recent years, there has been a significant increase in the number of children who are openly questioning the way they feel about being a boy or a girl, including the physical attributes of their sex and the related ways in which they fit into society. In response, successive governments have explored how to support schools to meet the needs of those children. We therefore work to the guidance outlined in KCSiE 2026.

When we refer to "social transition", we refer to any changes or support put in place to facilitate the child presenting as the opposite biological sex. For example:

- A child using different pronouns to refer to themselves
- A child referring to themselves by a different name that is generally associated with the opposite sex or more "gender-neutral".
- A child beginning to wear clothing (including school uniform) that is more generally associated with the opposite sex

A child wishing to use changing rooms or toilets that are designated for members of the opposite sex (please see below for clarity in this area).

As a school, we will:

- Train staff to understand that every child is unique, and it is common and completely natural for children to engage in activities that are less typically associated with their sex.
- Never make assumptions that a child may be questioning their gender but rather will respond to any circumstances where a child or their parent has raised a request relating to social transition. When considering such a request, first consider and prioritise what is in the best interests of the child and other children.
- Not adopt any changes relating to social transition unless a decision has been made by a school or college alongside a child's parents/carers taking into account all of the factors outlined below. Our decision-making process will be documented with records kept, and where necessary, reviewed.
- Comply with our obligations under safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by an evaluation of the welfare and best interests of the child - and other children.
- Prioritise working closely with parents or carers to determine what is in the best interests of the child as well as considering any clinical evidence or advice and seeking any additional non-clinical professional advice where relevant (for example from the SENCO and DSL) in order to take into account other factors such as wider health issues or neurodiversity.
- Not allow pupils into toilets, changing rooms, or boarding/residential accommodation (including on school residential trips) designated for the opposite sex, with no exceptions, in line with KCSiE. This will be the case whether other elements of social transition have been implemented. Similarly, where we have implemented single-sex sports as being necessary for safety reasons, pupils will not be allowed to participate in sports designated for the opposite sex.
- Appropriately sanction any cases of bullying or harassment in line with our behaviour policy, whilst also being conscious of the rights of pupils and staff in relation to their religion or belief.
- Ensure all relevant staff are aware of a child's biological sex in all cases. We are legally required to record a child's biological sex accurately wherever it is recorded.
- Maintain flexibility and keep options open for children who have socially transitioned, working with parents/carers and relevant experts to support children who wish to fully or partially reverse a social transition request.

Should I always report to the DSL if a child tells me they are questioning their gender?

No, not necessarily.

In cases where a child confides in a member of staff about their feelings/questions about their gender but does not ask the school to make changes to how they are treated, there is **no reason** to break any confidence unless there is a related safeguarding risk.

What might constitute a safeguarding risk?

- If a child has made a request for support with social transition, it is important to involve the DSL. In the rare circumstances where involving parents/carers would constitute a greater risk to the child than not involving them, the DSL will need to determine what action is needed to safeguard the child, before the parents or carers are contacted or any decisions are taken.

- As the DSL is likely to be privy to more information about risks facing a child; it is important that nobody discusses the social transition request with parents/carers without first discussing with the DSL.

- Some children who socially transition before puberty will be "living in stealth" meaning other pupils and/or staff may be unaware of their biological sex. Staff should be particularly conscious of the vulnerabilities of such children. For example, they are likely to approach puberty in a fearful and anxious state and may require additional support.

Staff will refer to the latest government and Diocesan guidance in relation to this issue.

Pupils Requiring Mental Health Support

- Mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, signs of an eating disorder, suicidal ideation or suicide. Furthermore, mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- School staff are not expected or trained to diagnose mental health conditions or issues. However, if a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which staff are well placed to recognise. They should always report these to the DSL.
- Staff therefore know to report to the DSL as a matter of urgency, if a child makes any reference to suicide. Staff understand that disclosures of suicidal ideation are rare and therefore they must be alert to jokes, insults and comments that may hide true feelings. Staff will also ensure any comments online about suicide or notes, drawings and doodles that raise concern must also be reported.
- If you have a mental health concern about a child, this should be reported to the DSL in order that support can be offered at an early stage.

The school should have an appointed lead for mental health in school who will have received appropriate and funded training.

Children from Gypsy, Roma and Traveller (GRT) Communities

It must be noted that, while being from a GRT community is not an inherent safeguarding risk in and of itself, research suggests that these communities can be more vulnerable to certain forms of abuse, neglect and exploitation.

School leaders will pay heed to the following government document in ensuring children from GRT communities are kept safe and supported to achieve good outcomes:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/181669/DFE-RR043.pdf

17. USE OF SCHOOL PREMISES FOR NON-SCHOOL ACTIVITIES

Where school leaders hire or rent out school or college facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided by the school, their arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. School Leaders should therefore seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place for the provider to liaise with the school or college on these matters where appropriate.

This applies irrespective of whether children who attend any of these services or activities are on the school roll. The governing body or proprietor should 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; and that failure to comply with this would lead to termination of the agreement. The guidance on Keeping children safe in out-of-school settings details the safeguarding arrangements that schools and colleges should expect these providers to have in place.

Extra-curricular clubs and charities should work collaboratively with the school to effectively safeguard pupils and adhere to local safeguarding arrangements. Organisations should provide evidence that shows safeguarding arrangements are in place.

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

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

18. VISITING SPEAKERS

The Prevent Duty (2023) set outs the following expectations around visiting and external speakers in schools:

“As part of managing the risk of radicalisation, schools’ safeguarding policies should set out clear protocols for ensuring that any visiting speakers, whether invited by staff or by children themselves, are suitable and appropriately supervised. In England, the Prevent duty complements schools’ other responsibilities for ensuring that speakers do not undermine the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs. (Prevent Duty Guidance in England and Wales HM Government 2023 Prevent duty guidance: England and Wales (2023) - GOV.UK (www.gov.uk))

The school should therefore have a clear process for establishing whether a speaker is suitable and appropriately supervised. This includes (but is not limited to):

- A list of appropriate checks on the suitability of the person, which may include internet searches and/or contacting other settings where the person has spoken previously.

- Although not always possible, it is useful to invite speakers from an established company, charity or other group whose aims are well-documented.
- A document for the speaker to read and sign, to ensure that they understand they must abide by the school's equality commitments; that there must be no statements which might cause offence to others, or otherwise undermine tolerance of other faiths or beliefs; and there must be no extremist material.
- The speaker being expected to talk with staff about the content of the presentation before the event; speakers and staff must allow time for this discussion, whether it is on the day or beforehand.
- An understanding that such talks and presentations will not be used to raise funds, without the prior written permission of the Principal.
- Visitors must be supervised at all times and not left alone with pupils, unless they have confirmed DBS checks.
- Visiting speakers should understand that their presentation will be brought to an early end, if the content proves unsuitable.
- All information about the visiting speaker and the booking process should be recorded on a suitable proforma.

19. ALTERNATIVE PROVISION AND MANAGED MOVE/TRANSFERS

The school will remain responsible for a pupil's welfare and education during their time at an alternative provision or whilst on a managed move or transfer to another education setting. During a managed move, the school will communicate regularly with both the school and the pupil themselves to establish whether the move is beneficial, and the child is safe.

When placing a pupil with an OFSTED registered alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding and safer recruitment checks.

BEBCMAT only supports the use of unregistered provision as an exception for some pupils within its schools. EHCP and CLA pupils must not use unregistered provision. If the school becomes aware that the provider is allowing any CLA or children with an EHCP from other schools, they should cease using the provision immediately and report this to the CEO and Local Authority.

School leaders should conduct a thorough safeguarding and educational audit of any alternative provider and ensure robust safeguarding procedures are in place, especially around attendance.

In line with the DfE Alternative Provision statutory guidance, the school will:

- Obtain written confirmation that appropriate safeguarding checks have been carried out on individuals working within the AP
- Be notified of any arrangements that may put the pupil at risk
- Remain fully aware of where a pupil is based during school/college hours (e.g. if the AP is using a satellite site or going on an educational trip).
- Review AP placements at least half termly
- Review and potentially terminate any placements where safeguarding concerns arise.

Further information can be found in Part Two of KCSiE 2026

20. WORK EXPERIENCE

If a school uses external providers for work experience, school staff must ensure that the provider has appropriate safeguarding policies and procedures in place, including safer recruitment procedures.

Where the school is used for work experience by others, enhanced DBS certificates, where applicable, will need to be obtained and the person must be added to the SCR.

21. HOMESTAY EXCHANGE VISITS

Host families - homestay during exchange visits

Schools sometimes make arrangements for children to take part in exchange visits, either to other parts of the UK or abroad. Exchanges can benefit learning across a range of subjects. In particular foreign visits can enrich the languages curriculum and provide exciting opportunities for pupils to develop their confidence and expertise in the use of other languages.

School staff have a duty to safeguard and promote children's welfare. This extends to considering their safety and how best to minimise risk of harm to those children during any exchange visit the school arranges, and when organising the care and accommodation for a child with a host family (known as homestays) as part of the exchange. Homestay families should be subjected to an enhanced DBS check with barred list information, to inform its assessment of the suitability of the response of adults.

Where criminal record information is disclosed, school staff will consider, alongside all other information, whether the adult is a suitable host. In addition to the responsible adults, the school will consider whether a DBS enhanced certificate should be obtained for anyone else aged over 16 in the household.

School-arranged homestays abroad

School staff will liaise with partner schools to discuss and agree the arrangements in place for the visit. The school will consider, on a case-by-case basis, whether to contact the relevant foreign embassy or High Commission of the country in question to ascertain what checks may be possible in respect of those providing homestay outside of the UK. School staff will use professional judgement to assess whether the arrangements are appropriate and sufficient to safeguard every child involved in the exchange. Pupils will be provided with emergency contact details to use where an emergency occurs, or a situation arises that makes them feel uncomfortable.

Privately arranged homestays

Where a parent or pupil arranges their own homestay, this is a private arrangement, and the school is not the regulated activity provider. However, as with all circumstances, if the school become aware of any safeguarding or child protection concerns in relation to the arrangement, these will be investigated and reported in line with this policy.

Private Fostering Arrangements

Where a period of UK homestay lasts 28 days or more for a child aged under 16, or under 18 for a child with SEND, this may amount to private fostering under the Children Act 1989.

Aside from arranged homestays, private fostering arrangements can take place when a child under the age of 16 (or 18 if they have a disability) is cared for by someone other than a close relative for 28 days or more. This person could be a:

- Family friend
- A friend of the child themselves
- A Great Aunt or Uncle
- A neighbour or member of the local community.

Examples of when a PFA might take place include:

- A child being sent to the UK for education or health care by parents who live overseas
- A young person living with a friend's family because of issues at home
- A parent/carer working overseas or out of area and asking an extended family member or a family friend to care for their children while they're away.

Where school staff become aware of a pupil being privately fostered, they will notify the DSL who will notify CSC as soon as possible.

22. WHAT TO DO IF YOU ARE CONCERNED ABOUT A CHILD

Information regarding the specific procedures for the school can be found in **Appendix 1.** Please refer to this section of the policy to fully understand the following:

- How to report a concern about a child.
- Specific guidance about how to make a referral.
- A flow chart of what happens when a concern is reported.

23. MANAGING REFERRALS

Each school will know and understand how to refer into the LA CSC and other safeguarding partners.

In our school, we have a DSL and several DDSLs. Therefore, there should always be someone available for you to discuss your concerns with.

If, the DSL or a DDSL cannot be found, Staff should consider speaking to a member of the senior leadership team. If not possible, this must **not** lead to a delay in taking action to safeguard a child and the staff member should make this referral.

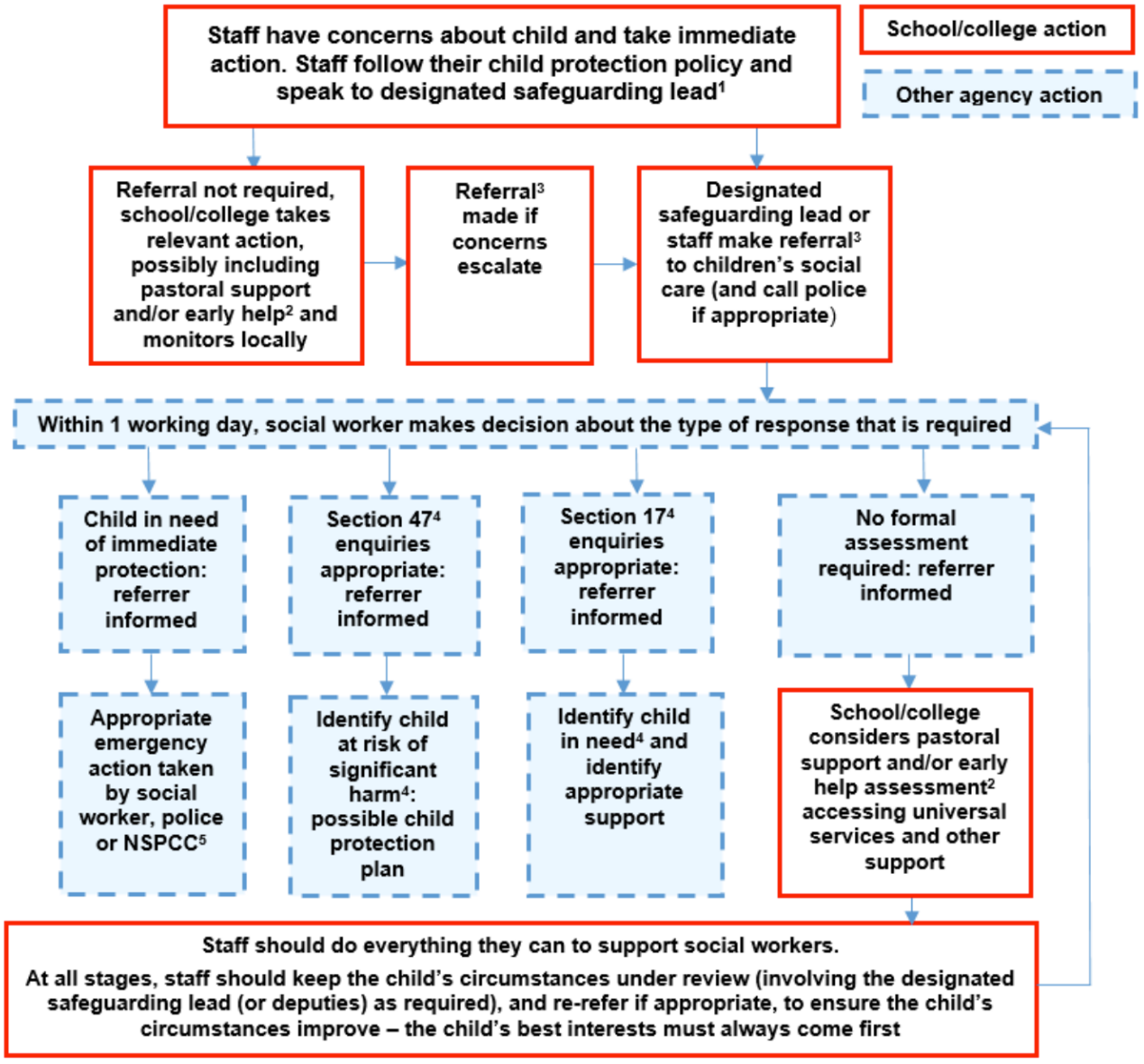
In these circumstances, any action taken or liaison with Children's Social Care should be shared with the DSL (or a deputy) as soon as is practically possible.

Following a referral, the school will not wait for the start or outcome of an investigation before protecting the child at risk and other pupils; this applies to criminal investigations as well as those made by CSC. Where CSC decide that a statutory investigation is not appropriate, the school leaders will consider referring the incident again if it is believed that the pupil is at risk of harm.

Where CSC decide that a statutory investigation is not appropriate and the school leaders agree with this decision, the school will consider the use of other support mechanisms, such as EHA and pastoral support.

If school leaders disagree with the decision of the Referral and Assessment Team, they should challenge the decision through the appropriate channels. Where the LA escalation policy is used, the Trust CEO must be informed.

At all stages of the reporting and referral process, the pupil will be informed of the decisions made, actions taken and reasons for doing so. Discussions of concerns with parents will only take place where this would not put the pupil or others at potential risk of harm. The school will work closely with parents to ensure that the pupil, as well as their family, understands the arrangements in place, such as in-school interventions, is effectively supported, and knows where they can access additional support.



24.SAFEGUARDING CONCERNS AND ALLEGATIONS AGAINST STAFF

It is important that staff within the school foster an attitude of "it could happen here" and allegations might be made. Staff must report any behaviour they feel may pose a risk to the pupils in their school. If something does not look or feel right, then the chances are it requires professional curiosity. School leaders will ensure that all allegations against staff, including those who are not employees of the school are dealt with appropriately and school leaders liaise with all relevant parties.

When managing allegations against staff, school leaders will recognise the distinction between allegations that meet the harms threshold and those that do not, also known as "low-level concerns" as defined in KCSiE. Allegations that meet the harms threshold could include, but are not limited to the following instances:

- Behaved in a way that has harmed a child or may have harmed a child.
- Committed or possibly committed a criminal offence relating to a child.
- Behaved towards a child in a way that indicates they may pose a risk of harm to children.
- Been negligent in following safeguarding policies or procedures.
- Behaved or may have behaved, in a way that indicates they may not be suitable to work with children.

All allegations should be reported to the Headteacher, who may decide to work with other members of SLT including the DSL to investigate or take further action.

Concerns that meet the threshold should be referred to the LADO via the LA reporting procedures.

Low level concerns should be reported to the Headteacher and a record should be kept securely following school procedures.

If anyone has any allegations or low-level concerns that relate to the Headteacher themselves, these should be reported directly to the Chair of Governors and the Trust CEO.

Appendix 3 outlines guidelines for good/safer working practices for all staff.

All Allegations of abuse against staff must also be reported to the CEO. Further information can be found in the Trust's policy for Dealing with Allegations of Abuse against Staff.

25.COMMUNICATION AND CONFIDENTIALITY

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including in relation to their educational outcomes. Schools have clear powers to share, hold and use information for these purposes. This should be done with the pupil's best interest in mind. Sharing of information regarding safeguarding matters should be undertaken on a need-to-know basis and this should be fully risk assessed and reviewed by the DSL.

Communication between staff should be done professionally through school recognised communication platforms. Staff should not communicate with other staff on a professional basis through their own personal emails or social media platforms. Communication should be respectful and dignified at all times and there should only be an expected response during accepted work hours. School staff should be mindful of their audience when communicating information within group emails.

When communicating safeguarding information, staff should be mindful of keeping the child's best interests as a priority, whilst fulfilling safeguarding obligations.

When communicating with individuals outside of the school community, secure emails must be used. If that is not possible then documents and data should be password protected and the password should be sent in a separate email.

Emails should carry a data protection statement in the signature with guidance for situations where an email is received in error.

Communication with parents / carers

Information should only be shared with an adult who is named on the School's MIS, unless they are a recognised agency. Sharing of information should happen with parental consent unless parental consent puts the child at further risk.

More information around Sharing of Information can be found in KCSiE and WTtSC 2026.

26.SAFER RECRUITMENT

Ongoing vigilance contributes to creating a diligent safeguarding culture and following good Safer Recruitment processes is a critical first line deterrent. School leaders must acknowledge abuse happens and '**it could happen here'**.

For anyone working with children or vulnerable adults, the law requires the fulfilment of numerous duties to keep them safe.

Fundamentally, people who are barred from certain activities involving children and vulnerable adults must not work for any school.

Working with children or vulnerable adults is classed as 'regulated activity'. In an educational setting, 'regulated activity' is defined as teaching, training, instructing or supervising children or providing advice or guidance on physical, emotional or educational wellbeing, or, driving a vehicle only for children, e.g. school transportation. Please note – the definition of "regulated activity" was adjusted in 2026, removing the element of supervision by a member of staff (particularly for volunteers).

Key elements of safer recruitment practice in schools

Safeguarding must be considered at every stage of the recruitment process, planning, advertising, interview and appointment.

- When writing the job description, it must include responsibility for safeguarding children.
- The person specification must include reference to suitability to work with children.
- The job advert must state that any successful candidate will be subjected to an enhanced DBS check (with barred list for teaching staff) and for specific management posts a s128 check, and that online checks will be carried out for all applicants invited for interview.
- Carefully select the panel for recruitment.
- Decide who will shortlist and interview the applicants.
- At least one person involved in the shortlisting process and interviews should be appropriately trained in safer recruitment.
- Two references must be obtained from the current and previous employer.
- Candidates must bring all relevant documents to interview
- Thorough and robust pre-employment checks must be undertaken before the successful candidate begins work.
- All documentation gathered as part of recruitment must be stored securely and confidentially.

Schools within the Trust may use the 'Check a teacher's record service' to make GTCE, prohibition, direction, restriction, and children's barred list checks.

For further information and more detail, see the Trust's Safer Recruitment Policy (insert link to policy here)

27.SINGLE CENTRAL RECORD (SCR)

Information about school staff (including teacher trainees on salaried routes, agency and third-party supply staff, even if they work for one day, trustees and regular visitors to the school must be kept on the school's single central record. Fee-funded trainee teachers should be recorded on the SCR.

For agency and third-party supply staff, the SCR must include whether written confirmation has been received. It must be evidenced that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates. This must include the date this confirmation was received and whether details of any enhanced DBS certificate have been provided in respect of the member of staff.

The following checks must be recorded on the SCR:

- An identity check
- A standalone children's barred list check
- An enhanced DBS check (with children's barred list check) requested / certificate provided
- A prohibition from teaching check
- Further checks on people who have lived or worked outside the UK
- A check of professional qualifications, where required
- A check to establish the person's right to work in the UK
- Section 128 checks for school leaders and trustees
- Whether staff have been informed of their duty to disclose relevant information under the childcare disqualification arrangements
- Checks made on Governors and Volunteers
- Dates when safer recruitment and safeguarding training was completed
- Employee online checks
- The name of the person who carried out each check.

BEBCMAT will hold the SCR centrally and have responsibility for updating central team details / records.

The DSL and Trust will routinely carry out checks on the SCR to monitor gaps or discrepancies in information. Action plan will be generated as an outcome where required to ensure compliance. The Chair of Governors or Lead Safeguarding Governor (LGS) should carry out a check of the SCR on a termly basis and ensure all required procedures have been completed.

It is the DSL's responsibility to ensure that the SCR is complete and up to date. The LGS also has a role in supporting the DSL to achieve compliance in this area.

The details of an individual should be removed from the SCR when their employment within the school ceases.

Fee funded trainee teachers

It is the responsibility of the initial teacher training provider to carry out the initial checks. Schools must obtain written confirmation from the provider that it has carried out all pre-appointment

checks that the school would otherwise be required to perform, and that the trainee has been judged by the provider suitable to work with children. The DSL should see a copy of the written confirmation.

Regular visitors

People who are regular visitors to the school should be held on the SCR. Visitors who come to school in a professional capacity should have their ID checked and photo ID must be presented. A DBS Certificate is not required to be presented for visitors or professionals and internal school procedures should be followed. Health and Social Care professionals should have a letter of assurance from their employer to verify that relevant checks have been completed.

If there are any doubts regarding the authenticity or lack of information regarding the status of a visitor attending school in a professional capacity, then school staff should not allow access to children.

28.HANDLING DISCLOSURES

Guidelines for responding to a person making a safeguarding disclosure

Whenever a child reports that they are suffering or have suffered significant harm through abuse or neglect, or have caused or are causing harm to others, the initial response should be limited to listening carefully to the child. If someone makes a disclosure this might be the only time they will tell someone about what is happening.

How to respond

- Listen.
- Take what is said seriously.
- Only use open questions (open questions begin with words like: who, what, when, where and how. Open questions cannot be answered with a 'yes' or 'no').
- Remain calm. It might be that the information is shocking or upsetting to you but do not react. (It is important, however, to acknowledge the impact this has had on you as soon as possible after the event with a colleague).
- Consider the person's age and level of understanding.
- Check, if face to face, whether they mind you taking notes while they talk so you can make sure you capture the information accurately. At the end you can check with them that you have understood everything correctly. However, do not ask a child to sign their or your own notes.
- Offer reassurance that disclosing is the right thing to do.
- Establish only as much information as is needed to be able to tell the DSL what is believed to have happened, when and where. The more times a child has to repeat their information the more traumatic this can be. The full disclosure will need to be made to the statutory agencies with professionals who have specific skills in this area.
- Check out what the child hopes to result from the disclosure.
- Tell the child what you are going to do next.

Do not:

- Make promises that cannot be kept (e.g. that you won't share the information).
- Make assumptions or offer alternative explanations. Don't try to "fill in the gaps" if a child's disclosure does not make perfect sense or is not in chronological order.
- Investigate. That is the responsibility of the statutory agencies. If you try to investigate you could compromise a police investigation further down the line.

- Contact the person about whom allegations have been made.
- Do a physical or medical examination including asking children to remove clothing.

Recording

- Make some very brief notes at the time, if appropriate, and write them up in full detail as soon as possible afterwards.
- Record the date, time, place and the actual words used.
- Record facts and observable things, not your interpretations or assumptions.
- Don't speculate or jump to conclusions.
- A record should be made of any visible marks or injuries to a child that give cause for concern, this may be completed on a body map. The child should not be examined intimately, or pictures taken of any injuries/marks.

It is acceptable to state professional opinion, but this must be clearly noted as such.

Reporting

- Report the matter to the DSL immediately. If there is immediate danger to a child contact the police.
- The DSL will advise regarding reporting to children's social care and/or the police. This must be done within 24 hours. If there is a risk of immediate danger, this should be done straight away and without delay. If in any doubt seek advice from children's social care and/or the police.

The Trust DSL and CEO are also available to advise and offer guidance as well as the consultants at Ella Savell-Boss Ltd.

Disclosure from a child who has caused harm

A disclosure may be made by a child who is a convicted offender or from a child who is disclosing previously unreported abuse. It is not unusual for a child to make a disclosure in school as often this can be deemed a safe place with school staff being stable positive adult role models in their otherwise disrupted lives. The motive for admitting what has happened may be a desire to address the problem and obtain help and it can bring a sense of relief for a child when they have disclosed. The person who admits to a potential offence against a child must be told that the information will **not** be kept confidential, and that the information will be passed on to children's social care and/or the police.

Be supportive but do not seek more details than you need. Report immediately to the DSL.

29. RECORDING AND REPORTING

All concerns, discussions and decisions made with the reasons for those decisions, should be recorded in writing using the school's electronic safeguarding system. This will also help if/when responding to any complaints about the way a case has been handled by the school. All components of the situation should be recorded centrally, including emails and telephone contacts.

Records should include:

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

If in doubt about recording requirements, staff should discuss with the DSL or DDSL

30.TRAINING

All staff must undertake regular safeguarding training to be sufficiently equipped to recognise, respond to and action safeguarding concerns.

DSL/DDSL

The DSL/DDSL is required to undertake specific training for their role at least every two years. However, they should seek opportunities to educate themselves on new and ongoing issues that reflect the school context.

Headteacher /Lead Governor for Safeguarding

The Headteacher/Lead Governor for Safeguarding should undertake DSL training to fully understand the role of the DSL in school and be able to make strategic decisions. They should also receive specific training about making referrals to LADO and managing staff allegations.

All staff

All staff should fully engage with safeguarding training throughout the academic year. This may include but is not limited to:

Induction training

Induction training should include how to report concerns including concerns about staff, the context of the school and key information regarding the school culture including expectations of all staff. Induction training should also include information regarding filtering and monitoring, including what to do if systems are infiltrated and who to report concerns to and the roles of responsibilities to do with filtering and monitoring.

Face to face training for all staff

This should include information about the context of the school and any changes in school policies, procedures or practice. A diligent safeguarding culture should be promoted that reinforces the fact that “it can happen here”. Face to face training should include any statutory requirements and guidance updates.

Online training

Online training in safeguarding in education should be completed every three years. However, good practice advises it should be undertaken more regularly. PREVENT duty training is an annual requirement.

Online training modules can be accessed for specific safeguarding issues that may be particular to the school or to a member of staff within their role.

The Trust training platform has a wide range of online modules, including Safeguarding in Education and Safer Recruitment Training, and is free to use. The trust training platform allows the school to keep accurate records of completed training modules.

Records of Training

Records of safeguarding training must be retained by the DSL. This should include:

- A record that staff have received and read key safeguarding policies including safeguarding child protection policy (Including child missing from education), staff code of conduct, online safety policy, school behaviour expectation policy and child on child abuse policy.
- Staff have received and read part 1 of the most recent version of KCSIE.
- Have competed annual PREVENT duty training.
- A record of completed online safeguarding training.
- A record of completed face to face training including KCSIE updates.

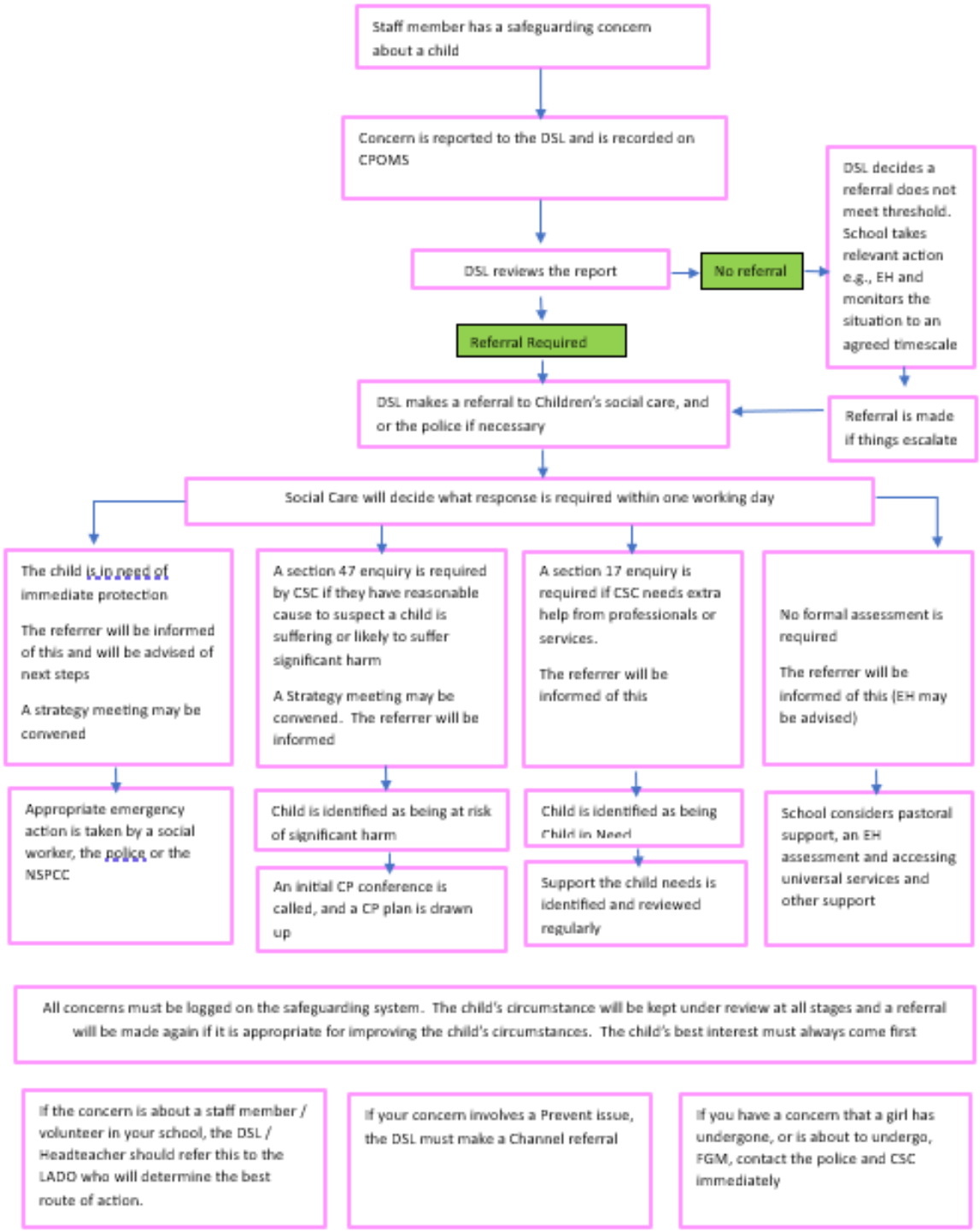
The school should keep a record of all completed safeguarding training. This includes the dates the training was completed, and the certificates achieved. There must be an up-to-date log acknowledging that staff have received and read all policies relating to safeguarding, in addition to part 1 of KCSiE.

31.MONITORING AND REVIEW

This policy is subject to annual review and additionally when changes to legislation and/or guidance is issued. The Trust and all school governing bodies will exercise their responsibilities in monitoring and reviewing in line with their statutory obligations.

Appendix 1 - SCHOOL SAFEGUARDING PROCEDURES

Flowchart of procedures for responding to safeguarding concerns



Appendix 2 – HOW TO MAKE A REFERRAL

As mentioned earlier in this policy, in the vast majority of cases, the DSL will consider whether a referral to Children's Services is necessary. However, in the unlikely event that the DSL or a deputy cannot be contacted and neither can members of SLT and/or the Safeguarding Lead for the Trust; it's vital that all staff know what to do next. If you believe a child may be at risk of harm, follow the procedures below.

NB. Schools and Academies within Lancashire often have young people attending who live in any one of the Local Authorities. It is therefore important that all staff are aware of the reporting procedures for all Local Authorities. The school will continue to liaise with the Local Authority Children's Services that they are situated in, and the DSL will keep up to date with information from the neighbouring Local Authorities.

Is it an emergency?

- If a child is at immediate risk of significant harm, please call 999 in the first instance for police and/or ambulance services and then contact Lancashire Children's Services using the website below. You should complete the online form to request a call back. https://www.lancashire.gov.uk/children-and-families/keeping-children-safe/tell-us-if-you-are-worried-about-a-child/
- To report urgent concerns for a child outside the hours of 8am to 5pm, Monday to Friday, call 0300 123 6722.

Non-emergency but still concerned?

If you have safeguarding or child protection concerns about a child, you should use this site and submit a request for support form. NB. If you have not used this site before, you will need to register before submitting a form.

https://www.lancashire.gov.uk/professionals/supporting-children-and-families/safeguarding-children/requesting-support-from-childrens-services/

Completing a request for support form

https://www.lancashire.gov.uk/media/a2pnwesx/children-and-families-service-guidance-november-2025-pdf.pdf

Please use the guide above to help you complete the form, if you are unclear on what is needed.

I have some concerns but I'm not sure they're serious enough

The link below will take you to the Continuum of Need which explains the thresholds for support in Lancashire.

https://www.lancashire.gov.uk/professionals/supporting-children-and-families/safeguarding-children/requesting-support-from-childrens-services/#video

If you believe that Early Help services will be able to assist the family, this can be offered through universal services and community-based early help (including support based in school) or a referral can be made to the targeted early help provision Led by Family Intensive Support Services.

Advice on how to complete an Early Help assessment and a link to the form itself, can be found here:

https://www.lancashire.gov.uk/professionals/supporting-children-and-families/early-help-assessment/

Other useful Contacts include:

Blackpool Children's Services – 01253 477299

Blackburn with Darwen Children's Services – 01254 666400

Lancashire Constabulary (Police) – 101 or in an emergency 999 or you can report non-emergency crimes via their website: https://www.lancashire.police.uk/

Lancashire Local Authority Designated Officer (LADO) - email lado.admin@lancashire.gov.uk for general advice. Use the following link to submit a LADO referral:

https://www21.apps.lancashire.gov.uk/w/webpage/1062GBLSM1?webpage_token=d030ffd200c7611e6e46f66eeb7dea759216d7a5e7a33d166aed5417ac94b047&auth=YjNiNzJmZDRiNGU2&id=14999901

Appendix 3 - Specific safeguarding issues

This appendix clarifies specific safeguarding issues that pupils may experience and outlines responses to be taken. These issues include but are not limited to:

1. Domestic abuse
2. Homelessness
3. Children absent from education
4. Child abduction and community safety incidents
5. Child Criminal exploitation (CCE)
6. Cybercrime
7. Child sexual exploitation (CSE)
8. Modern slavery
9. FGM
10. Virginity testing and hymenoplasty
11. Forced marriage /Child marriage
12. Radicalisation
13. Pupils with parents or carers in prison
14. Pupils required to give evidence in court
15. Mental health (including eating disorders, self-harm)
16. Serious youth violence
17. Fabricated or Induced illness (Munchhausen's by proxy)
18. Sextortion
19. Spiritual or Faith-based Abuse

1. Domestic abuse

In line with the Domestic Abuse Act 2021, "domestic abuse" is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person's child) where both are aged 16 or over and are personally connected. "Abusive behaviour" includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse. "Personally connected" includes people who:

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

- Are relatives.

The school will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of, or live in a household characterised by domestic abuse.

All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

Operation Encompass

If police are called to an incident of domestic abuse and any children have experienced the incident, and/or live in the household, the police will inform the key adult in school (usually the DSL) before the child or children arrive at school the following day. This process is called Operation Encompass. You can read more about this in Annex A of KCSIE 2026.

The DSL will then provide support according to the child's needs (which may include a referral to Children's Services and/or the police) and update records about their circumstances.

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

2. Homelessness

The DSL and deputy DSLs will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include:

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

Referrals to the Local Housing Authority do not replace referrals to CSC where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family based and referrals to CSC will be made as necessary where concerns are raised. An early help assessment should be completed for anyone who is at risk of becoming homeless.

3. Children absent from education (previously Children missing from education)

A child who is missing from school is a potential indicator of abuse or neglect and, as such, these children are potentially at an increased risk of being victims of harm, exploitation or radicalisation.

Staff will monitor pupils missing from the school, particularly on repeat occasions, and liaise with the DSL in line with school and LA safeguarding procedures, The school will inform the LA of any pupil who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more. Children whose whereabouts cannot be established must be brought to the immediate attention of the LA and where appropriate the police should complete a safety and welfare check.

Admissions Register

Pupils are placed on the admissions register at the beginning of the first day agreed by the school, or when the school has been notified of their start date. School staff responsible for admissions will notify the LA within 5 days of when a pupil's name is added to the admissions register.

School staff will ensure the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur. Parents must be actively encouraged to report any change of circumstances that will affect the admissions register.

Two emergency contacts will be held for each pupil where possible.

Staff will monitor pupils who do not attend the school on the agreed date and will notify the LA in line with procedures.

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

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

Where a pupil moves to a new school, the school will use a secure internet system to securely transfer pupils' data. To ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any pupil who will be deleted from the admission register, in accordance with the Education (Pupil Registration) (England) Regulations 2006 (as amended), where they:

- Have been taken out of the school by their parents, and are being educated outside the national education system, e.g. elective home education.
- Have ceased to attend the school, and no longer live within a reasonable distance of the school.
- Have been in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of that period.
- Have been permanently excluded.

The school will also remove a pupil from the admissions register where the school and LA has been unable to establish the pupil's whereabouts after making reasonable enquiries of their attendance.

A pupil should not be removed from the admissions register without written confirmation from the LA.

If a pupil is to be removed from the admissions register, the school will provide the LA with the following information:

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

The school will work with the LA and within current attendance guidance to reintegrate pupils into full time education.

The school will also provide any other contextual information, including safeguarding concerns in line with school procedures.

4. Child abduction and community safety incidents

Child abduction is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the child, and strangers.

All school staff will be alert to community safety incidents taking place in the vicinity of the school that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with pupils. Appropriate risk assessments should be considered in such circumstances.

Pupils will be provided with practical advice in lessons to ensure they can keep themselves safe outdoors for example stranger danger strategies. This will be underpinned by a carefully planned and well sequenced PSCHE curriculum.

5. Child criminal exploitation (CCE)

Child criminal exploitation is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the child needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Encouraging children to accrue drug debts to foster dependency leading to drug trafficking.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

School staff will recognise that pupils involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual and will follow school safeguarding procedures.

School staff will also recognise that pupils of any gender are at risk of CCE. School staff will be aware of the indicators that a pupil is the victim of CCE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Experiencing changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education or not taking part.

County Lines

County Lines refers to gangs and organised criminal networks that exploit children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

In addition to the general indicators for CCE, school staff will be aware of the specific indicators that a pupil may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.
- Being exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owing a 'debt bond' to their exploiters.
- Having their bank account used to facilitate drug dealing.

Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs.

Staff members who suspect a pupil may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider a referral to the National Referral Mechanism on a case-by-case basis, in line with statutory agency arrangements and other providers who offer support to victims of county lines exploitation.

6. Cyber-crime

Cyber-crime is defined as criminal activity committed using computers and/or the internet. (including mobile phones)

This includes 'cyber-enabled' crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and 'cyber-dependent' crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as 'hacking'.
- Denial of Service attacks, known as 'booting'.
- Making, supplying or obtaining malicious software, or 'malware', e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence e.g. corruption of school IT networks.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring pupils to the National Crime Agency's Cyber Choices programme.

7. Child sexual exploitation (CSE)

Child sexual exploitation is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

School staff recognise that CSE can occur over time or be a one-off occurrence, and may happen without the pupil's immediate knowledge, e.g. through others sharing videos or images of them on social media.

School staff recognise that CSE can affect any pupil who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16 and above who can legally consent to sexual activity.

School staff also recognise that pupils may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

School staff will be aware of the key indicators that a pupil is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Experiencing changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education or not taking part.
- Having older partners.
- Having sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

Where CSE, or the risk of it, is suspected, school staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the LA as appropriate. The LA will then provide /advise on the appropriate response.

Learning from The Casey Audit:

The 2025 National Audit on Group-Based Child Sexual Exploitation and Abuse, led by Baroness Louise Casey can be read here:
https://assets.publishing.service.gov.uk/media/685559d05225e4ed0bf3ce54/National_Audit_on_Group-based_Child_Sexual_Exploitation_and_Abuse.pdf

In response to some of the key findings of the audit, staff will:

- Understand that a teenager's apparent willingness or relationship with an adult should not be treated as meaning they have consented to exploitation.

- Avoid treating adolescents as more adult or responsible for their own abuse. This is especially pertinent considering the widespread concerns that BIPOC (and particularly black) young people are often "adultified" by both the police and within education settings.

- Prioritise early information sharing between statutory safeguarding partners (e.g. children's services, police etc) when necessary to protect a child.

8. Human Trafficking and Modern slavery

It is vital that professionals understand that despite slavery having been abolished in the UK in 1834, modern slavery has continued and in fact, escalated with the Global Slavery Index estimating that in 2021, there were 49.6M people in modern slavery – a number that has since risen.

In fact, in 2024, there were 5,999 potential **child victims** of modern slavery referred to the UK's National Referral Mechanism (NRM), representing 31% of all potential victims. Of these children, 78% were male.

Modern slavery encompasses exploitation, including sexual exploitation, criminal financial exploitation, human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including forced labour, slavery, servitude, forced criminality and the removal of organs.

Under the Modern Slavery Act 2015, Human Trafficking is defined as the following:

A person commits an offence if the person arranges or facilitates the travel of another person ("V") with a view to V being exploited.

(2) It is irrelevant whether V consents to the travel (whether V is an adult or a child).

(3) A person may in particular arrange or facilitate V's travel by recruiting V, transporting or transferring V, harbouring or receiving V, or transferring or exchanging control over V.

Examples of trafficking include:

- A child being trafficked into the UK from overseas for the purposes of domestic servitude
- A child being trafficked from one side of the city to the other side of the city for the purposes of sexual exploitation (whether or not the child believes the situation is exploitative)
- County Lines exploitation – where a child is trafficked from an urban area to a rural area for the purposes of criminal exploitation (e.g. selling drugs or storing weapons).

Examples of places and situations in which Modern Slavery can be present include but are not limited to:

- Car washes
- Home help / housekeeping
- Manual labour especially on building sites
- Farm labouring
- Travelling fairgrounds / circuses
- Cannabis farms
- Inexpensive childcare provision
- Nail salons
- Sexual Exploitation

If a member of staff becomes concerned that a child may be at risk of MDS and/or HT, it is vital that these concerns (including disclosures or signs and indicators such as those outlined above) are reported to the DSL.

If the DSL investigates and assesses that the child is at risk and needs further support, they will refer to services such as the police, Children's Services and the National Referral Mechanism (NRM)which is the system used within the UK to support potential victims of exploitation and modern slavery.

9. FGM (Female Genital Mutilation)

FGM is defined as any procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs.

FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

School staff will be alert to the possibility of a pupil being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSC and/or the police.

The school's procedures relating to managing cases of FGM and protecting pupils will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are legally required to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18.

Teachers failing to report such cases may face disciplinary action or prosecution. Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they are under a **legal obligation** to personally report to the police where an act of FGM appears to have been carried out. The DSL must be notified of any situation involving known or suspected FGM and school safeguarding procedures must be followed.

All staff will be aware of the indicators that pupils may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the pupil. It is important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a pupil may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family and their level of integration into UK society.
- The pupil coming from a community known to adopt FGM.
- Any girl with a mother or sister who has been subjected to FGM.
- Any girl withdrawn from PSHE and PE.

Indicators that FGM may take place soon include:

- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a 'special procedure' or a ceremony to 'become a woman'.
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.
- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin.

Indicators that FGM may have already taken place include the pupil:

- Having difficulty walking, sitting or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from school, followed by withdrawal or depression.
- Being reluctant to undergo routine medical examinations.
- Asking for help, but not being explicit about the issue due to embarrassment or fear.

FGM is included in the definition of So-called 'honour'-based abuse (HBA), which involves crimes that have been committed to defend the perceived honour of the family and/or community.

All forms of HBA are forms of abuse and will be treated and escalated as such.

Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

10. Virginity testing and hymenoplasty

Under the Health and Care Act 2022, it is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK.

It is also illegal for UK nationals and residents to carry out the practice outside of the UK.

Virginity testing - Also known as hymen, '2-finger' or vaginal examination - this is defined as any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place, irrespective of whether consent has been given. Vaginal examination has no established scientific merit or clinical indication.

Hymenoplasty - A procedure which can involve a number of different techniques, but typically involving stitching or surgery, undertaken to reconstruct a hymen with the intent that the person bleeds the next time they have vaginal intercourse.

Hymenoplasty is different to procedures that may be performed for clinical reasons, e.g. surgery to address discomfort or menstrual complications.

Virginity testing and hymenoplasty are forms of violence against women and girls and are part of the cycle of HBA and can be precursors to child or forced marriage and other forms of family and/or community coercive behaviours, including physical and emotional control.

Victims are pressurised into undergoing these procedures, often by family members or their intended husbands' family to fulfil the requirement that a woman remains 'pure' before marriage.

Those who 'fail' to meet this requirement are likely to suffer further abuse, including emotional and physical abuse, disownment and even so-called 'honour' killings. The procedures are degrading and intrusive, and can result in extreme psychological trauma, provoking conditions such as anxiety, depression and PTSD, as well as physical harm and medical complications.

School staff will be alert to the possible presence of stress, anxiety and other psychological or behavioural signs, and mental health support should be made available where appropriate.

Victims face barriers in coming forward, e.g. they may not know that the abuse was abnormal or wrong at the time, and may feel shameful, having been taught that speaking out against family and/or the community is wrong, or being scared about the repercussions of speaking out.

School staff will educate pupils about the harms of these practices and dispel myths, e.g. the belief that virginity determines the worth of a woman, and establish an environment where pupils feel safe enough to make a disclosure. Pupils aged 13 and older are considered to be most at risk, but it can affect those as young as 8, and anyone with female genitalia can be a victim regardless of age, gender identity, ethnicity, sexuality, religion, disability or socioeconomic status.

Any teaching of this material will be underpinned by agreed RSE policies.

School staff will be aware of the following indicators that a pupil is at risk of or has been subjected to a virginity test and/or hymenoplasty:

- A pupil is known to have requested either procedure or asks for help
- Family members disclose that the pupil has already undergone the practices
- Pain and discomfort after the procedures, e.g. difficulty in walking or sitting for a long period of time which was not a problem previously
- Concern from family members that the pupil is in a relationship, or plans for them to be married
- A close relative has been threatened with either procedure or has already been subjected to one
- A pupil has already experienced or is at risk of other forms of HBA
- A pupil is already known to social services in relation to other safeguarding issues
- A pupil discloses other concerns that could be an indication of abuse, e.g. they may state that they do not feel safe at home, that family members will not let them out the house and/or that family members are controlling
- A pupil displays signs of trauma and an increase in emotional and psychological needs, e.g. withdrawal, anxiety, depression, or significant change in behaviour
- A pupil appears fearful of their family or a particular family member
- Unexplained absence from school, potentially to go abroad
- Changes in behaviour, e.g. a deterioration in schoolwork, attendance, or attainment.

The above list is not exhaustive, but if any of these indicators are identified, school staff will immediately raise concerns with the DSL. An assessment of the risk they face will be undertaken. If there is believed to be immediate danger, the police will be contacted without delay.

The school will not involve families and community members in cases involving virginity testing and hymenoplasty, including trying to mediate with family or using a community member as an interpreter, as this may increase the risk of harm to the pupil, including expediting arrangements for the procedure.

11. Forced / child marriage

Forced / child marriage is a marriage where one or both spouses do not consent to the marriage but are coerced into it. It is illegal for a marriage to take place where one of the participants is under the age of 18. Force can be physical, psychological, financial, sexual and emotional pressure. A lack of full and free consent can be where a person does not consent or where they cannot consent, e.g. due to some forms of SEND.

Where an individual lacks the capacity to consent to marriage, coercion is not required for a marriage to be forced. Please note – forced/child marriage is always illegal even if the marriage is not legally binding and is rather, a religious or cultural ceremony.

All staff will be alert to the indicators that a pupil is at risk of, or has undergone, forced marriage, including, but not limited to, the pupil:

- Being absent from school – particularly where this is persistent.
- Requesting for extended leave of absence and failure to return from visits to country of origin.
- Being fearful about forthcoming school holidays.
- Being subjected to surveillance by siblings or cousins at school.
- Demonstrating a decline in behaviour, engagement, performance, exam results or punctuality.
- Being withdrawn from school by their parents.
- Being removed from a day centre when they have a physical or learning disability.
- Not being allowed to attend extracurricular activities.
- Suddenly announcing that they are engaged to a stranger, e.g. to friends or on social media.
- Having a family history of forced marriage, e.g. their older siblings have been forced to marry.
- Being prevented from continuing to further or higher education.
- Showing signs of mental health disorders and behaviours, e.g. depression, self-harm, anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.

Staff who have any concerns regarding a pupil who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL or headteacher and local safeguarding procedures will be followed – this could include referral to CSC, the police or the Forced Marriage Unit.

The DSL or headteacher will ensure the pupil is spoken to privately about these concerns and further action taken as appropriate. Pupils will always be listened to, and their comments taken seriously. It will be made clear to staff members that they should not approach the pupil's family or those with influence in the community, without the express consent of the pupil, as this will alert them to the concerns and may place the pupil in further danger.

Advice will be sought from the Forced Marriage Unit following any suspicion of forced marriage among pupils. If a pupil is being forced to marry, or is fearful of being forced to, the school will be especially vigilant for signs of mental health disorders and self-harm.

The pupil will be supported by the DSL and senior mental health lead and referrals will be made on a case-by-case basis.

School staff will familiarise themselves with how they can support victims of forced / child marriage in order to respond to the victims needs at an early stage and be aware of the practical help they can offer, e.g. referral to CSC and local and national support groups.

Local child safeguarding procedures will be activated following concerns regarding forced / child marriage – school staff will use existing national and local protocols for multi-agency liaison with police and CSC.

School staff will support any victims to seek help by:

- Making them aware of their rights and choices to seek legal advice and representation.
- Recording injuries and making referrals for medical examination where necessary.
- Providing personal safety advice.

- Developing a safety plan in case they are seen, e.g. by preparing another reason for why the victim is seeking help.

School staff will establish where possible whether pupils at risk of forced /child marriage have a dual nationality or two passports.

School staff will aim to create an open environment where pupils feel comfortable and safe to discuss the problems they are facing – this means creating an environment where forced / child marriage is discussed openly within the curriculum and support and counselling are provided routinely.

School leaders will adopt a whole school approach towards educating pupils about forced / child marriage and this should be embedded in the school culture and curriculum. In particular the school's RSHE curriculum will incorporate teaching about the signs of forced / child marriage and how to obtain help and support.

Pupils will be sign posted to appropriate materials and sources of further support. They will be encouraged to access appropriate advice, information and support. School staff will be educated through CPD about the issues surrounding forced / child marriage and the signs to look out for.

12. Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Keeping Children Safe in Education 2026 defines Extremism as:

"The vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. It can include calling for the death of members of the armed forces."

Terrorism refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system.

The use or threat of these actions is designed to influence the government or intimidate the public and be made for the purpose of advancing a political, religious or ideological cause. Protecting pupils from the risk of radicalisation is part of the school's wider safeguarding duties. This includes a commitment to The British Values and teaching them throughout the curriculum. School staff will be alert to the risk of pupils being radicalised and drawn into extremism and/or terrorism and follow local safeguarding procedures.

Forms of extremist ideologies include (but are not limited to):

- Religious Extremism
- Political Extremism
- Animal Rights Extremism
- Environmental Extremism
- Single Issue Extremism
- Mixed, Unclear or Uncertain Extremism (including extreme misogyny often associated with extreme 'incel' communities)

School staff will be alert to changes in pupils' behaviour which could indicate that they may need help or protection. School staff will use their professional judgement to identify pupils who may be at risk of radicalisation and act appropriately, which may include contacting the DSL or making a referral to CHANNEL through the PREVENT duty.

The school will work within local safeguarding arrangements at all times. School Staff will ensure that they engage with parents and families, recognising they are often in a key position to spot signs of radicalisation. However, parents may also be influential in such behaviour, hence the need for a comprehensive risk assessment.

Any concerns over radicalisation will be discussed with the pupil's parents, unless the school has reason to believe that the child would be placed at risk as a result. The DSL and all school staff will undertake Prevent awareness training appropriate to their role.

Under the Prevent Duty section 26 of the Counterterrorism and Security Act 2015, all schools are subject to a duty to have "due regard to the need to prevent people from being drawn into terrorism", known as "the Prevent duty".

The Prevent Duty will form part of the school's wider safeguarding obligations.

https://assets.publishing.service.gov.uk/media/65e5a5bd3f69457ff1035fe2/14.258_HO_Prevent+Duty+Guidance_v5d_Final_Web_1_.pdf

13. **Pupils with family parents or carers in prison**

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

14. **Pupils required to give evidence in court:**

Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support. Pupils will be provided with the appropriate guidance booklet 'Young Witness booklet for 5-to-11-year olds' or 'Young Witness booklet for 12-to-17-year olds' from HMCTS and will be offered the opportunity to discuss questions and concerns.

15. **Serious Youth Violence**

Serious youth violence (SYV) is defined as 'any offence of most serious violence or weapon-enabled crime, where the victim is aged 1-19'. This might include murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. While knife crime is most common, SYV may also include threats involving or actual attacks using acid and corrosive substances or other weapons.

SYV can take place in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. The likelihood of involvement in SYV may be increased by factors such as being male, frequent absence or exclusion from school, having experienced abuse, neglect or exploitation and having been involved in offending. However, staff are aware that SYV can also affect girls and young women.

Schools play a key role in protecting children from violence, safeguarding victims, as well as those who may be at risk of, or are involved in committing violence (who may also be victims themselves).

Signs and Indicators include (but are not limited to):

- Increased absence from school or college,
- A change in friendships or relationships with older individuals or groups,
- Self-harm or a significant change in wellbeing,
- Unexplained injuries

Staff will be made aware of some of the most significant risk factors that could increase a pupil's vulnerability to becoming involved in serious violence.

These risk factors include, but are not limited to:

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

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

16. Fabricated or Induced Illness (FII)

Fabricated or induced illness (FII) is a rare form of child abuse. It happens when a parent or carer exaggerates or deliberately causes symptoms of illness in the child. The parent or carer tries to convince doctors that the child is ill, or that their condition is worse than it really is.

The parent or carer does not necessarily intend to deceive doctors, but their behaviour is likely to harm the child. For example, the child may have unnecessary treatment or tests, be made to believe they're ill, or have their education disrupted.

FII used to be known as "Munchausen's syndrome by proxy" (not to be confused with Munchausen's syndrome, where a person pretends to be ill or causes illness or injury to themselves. However, it should be considered by staff to be a risk of emotional harm to the child where a parent/carer fabricates their own illness/injury)

Signs of fabricated or induced illness

Fabricated or induced illness (FII) covers a wide range of symptoms and behaviours involving parents or carers seeking healthcare for a child. This ranges from exaggerating or inventing symptoms, to deliberately making the child ill.

Behaviours in FII can include a parent or carer who:

- persuades healthcare professionals that their child is ill when they're healthy.
- exaggerates or lies about their child's symptoms.
- manipulates test results to suggest the child is ill, for example, by putting glucose in urine samples to suggest the child has diabetes.
- deliberately induces symptoms of illness, for example, by poisoning their child with unnecessary medicine or other substances.

- Cases where the parent or carer wrongly reports symptoms are much more common than cases where they induce illness in the child.

Why fabricated or induced illness happens

The reasons why FII happens are not fully understood. The parent or carer will have a need for their child to be treated as if they're ill, or as being more unwell than they really are. Their behaviour is intended to convince doctors that the child is ill.

This may be because the parent or carer gains something, such as attention, support or closeness to the child. Alternatively, it may be because they have anxiety or incorrect beliefs about their child's health, and they need these beliefs to be confirmed and acted upon. The parent or carer is not always fully aware of the reasons for their own behaviour. Many parents or carers involved in FII have personality disorders endorsed by emotional instability, impulsiveness and disturbed thinking. Some parents or carers involved in FII have so-called "somatoform disorders", where they experience multiple, recurrent physical symptoms. A proportion of these parents or carers also have Munchausen's syndrome. Some parents or carers have unresolved psychological and behavioural problems, such as a history of self-harming or alcohol misuse. Some have experienced the death of another child. There have also been several reported cases where illness was fabricated or induced for financial reasons. For example, to claim disability benefits.

What to do if you suspect a child is at risk

FII is a child safeguarding issue and needs specialist guidance and intervention.

School staff who suspect FII is happening must report their concerns to the DSL who will liaise with social services and the police and must follow local child safeguarding procedures.

If you suspect someone you know may be fabricating or inducing illness in their child, do not confront them directly. It's unlikely to make the person admit to wrongdoing and it may give them the opportunity to dispose of any evidence of abuse.

17. Sextortion

In some cases, incidents of sharing nudes may initially appear as child-on-child due to the offender posing as a child online. However, upon further investigation, it may come to light that the incident is, in reality, adult aggravated.

In all cases involving an adult perpetrator, the DSL would immediately contact the police and children's social care. These cases may be sexually motivated or constitute a case of 'Financially motivated Sexual Extortion', known commonly as 'Sextortion'.

Sextortion is when young people (and adults) are forced into paying money or meeting another financial demand (such as purchasing a pre-paid gift card) after an offender has threatened to release sexual/indecent images of them.

The sexual images do not even have to be real. They may be deepfaked images…or even just the threat that the offender has some images – even if they never evidence this to the young person.

Some sextortion might include the threat of sharing intimate information (such as that the young person HAS sent some nudes at some point to someone, or that they are sexually active)

Sextortion may take place just once or may become an ongoing pattern of abuse.

If the DSL believes a child is – or could be – a victim of Sextortion, they will move swiftly to safeguard the child. Depending on the facts of the case, they will:

- Tell the child not to delete any images or communications with the perpetrator/s
- Tell the child not to send money or to declare the amount of money they have sent over, and the method by which they did this.
- ALL Sextortion is a crime, no matter the child's age so the police should always be contacted. Children's Social Care or Adult Social Care (for young people over the age of 18) would be contacted in the majority of cases.
- Support the child to use tools such as: 'Report Remove', the Internet Watch Foundation and Childline's tool, to report images that have been shared or might be shared online.
- Alternatively, the 'Take It Down', a tool provided by the National Center for Missing and Exploited Children, can help them remove or stop the online sharing of images across participating online platforms.
- Report directly to the platform or app that the incident has occurred on.

Unless doing so would place the child at further risk of harm, the DSL would liaise with parents/ carers to ensure the child can be monitored and kept safe online.

18. Spiritual or Faith-based Abuse

Linked with emotional abuse, spiritual or faith-based abuse could be defined as an abuse of power, often done in the name of God, a Higher Power or Religion. This abuse of power involves manipulating or coercing someone into thinking, saying or doing things without respecting their right to choose for themselves.

Some indicators of spiritual abuse might be a leader who is intimidating and imposes their will on other people, perhaps threatening dire consequences or the wrath of God if disobeyed.

They may say that God or the individual's Higher Power/s have revealed certain things to them and so they know what is right. Those under their leadership are fearful to challenge or disagree, believing they will lose the leader's (or more seriously their Higher Power's) acceptance and approval.

All suspicions of the above, must be reported to the DSL.

The UK government have released the following document which provides more information for supporting children affected by spiritual or faith-based abuse:

https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief

19. Allergies, Anaphylaxis and Benedict's Law

As part of our safeguarding duties, we have a particular safeguarding responsibility for children with allergies and health conditions. Please see our policy on First Aid and Managing Medical Conditions which can be found here: St William's Catholic Primary School - Policies

The fact that there has been an incident relating to the management of a child or young person's medical condition (including allergies) would not in and of itself warrant a referral to Children's Social Services. Rather, a safeguarding referral would only be needed where an incident highlighted concern that the child or young person might be at an increased risk of being neglected, abused or

exploited by persons inside or outside of their family unit because of their medical condition. This might occur where relevant information about a child or young person's medical condition is not provided to a school, college or setting, or where they are repeatedly sent without essential medication, thereby putting the individual at risk.

The following is a summary of what we have in place to safeguard children with allergies (whether diagnosed or not):

- A large number of trained first aiders – all of whom are listed on posters around the school site.
- All staff have regular training on allergies and anaphylaxis (including signs and indicators) and how to deal with emergency allergy situations.
- A member of staff who is a trained Paediatric First Aider will always be present when EYFS children are eating.
- We maintain an accurate register of pupils with diagnosed allergies. This is shared on a need-to-know basis with relevant staff.
- Families are regularly asked to update school about any potential allergies or intolerances. If the child does not already have one, an allergy management plan will be created alongside parents/carers as well as any medical professionals involved. If a child is at risk of severe allergic reaction, an Individual Healthcare Plan will be created. These will be reviewed annually or sooner, if needs change.
- A copy of these will be printed and laminated and kept in the school canteen. Canteen staff are expected to check this daily.
- All allergic reactions and near-misses are to be recorded and analysed by key staff in order to risk assess and ensure any plans are updated immediately.
- The school has spare adrenaline auto-injectors (often referred to as "EpiPens"), salbutamol inhalers and of course, first aid kits that are regularly checked and replaced where necessary.
- Risk assessments will be regularly completed by catering staff (as well as school staff responsible for specific activities/trips) for:

    - Classrooms (Including but not limited to, for food technology lessons)
    - Dining areas,
    - School trips and extracurricular activities where food may be prepared and/or consumed
    - Breakfast and after-school clubs
    - Celebrations and fundraising events where food may be prepared and/or consumed

Appendix 4 - Good Working Practices

Staff guidelines

In line with safer working practices, the staff Code of Conduct / staff behaviour policy, staff should be guided by safer working practices and the following advice to avoid false allegations and situations which may give rise to misinterpretation:

- Avoid whenever possible unobserved situations of one-to one contact with a child. If they are unavoidable, always keep a door open and try to ensure that staff are within the hearing of another member of staff and there is a clear purpose to the activity.
- Do not transport children alone in a vehicle. If this is absolutely unavoidable, notify the DSL as soon as possible. The child should sit in the back seat of the vehicle in such circumstances. Both the child and member of staff should carry a mobile phone. Any concerns must be reported immediately to the DSL and followed up with a written statement.

Staff should be mindful that off-site environments present greater opportunities for contact between children and staff, both formal and informal, and staff in all their dealings with children, should be guided by the following advice:

- Do not engage in, or allow any sexually provocative games whether based on talking or touching or engage in “horseplay” involving pupils.
- Never make suggestive or discriminatory comments to a pupil.
- Avoid “favouritism” and singling out “troublemakers”.
- Never trivialise child abuse or safeguarding matters.
- Issue clear guidance and Code of Conducts to staff and pupils prior to the visit
- Ensure there is a clear education, trips and visits policy in place that identifies potential safeguarding issues
- Ensure the school has an appointed Educational Visits Coordinator (EVC) to oversee the organisation and safety of all school trips and visits
- Ensure all trips and visits are underpinned by detailed risk assessments for the activity.

Safeguarding concerns and allegations against staff or another adult in the school (including supply teachers, volunteers and contractors):

Safeguarding allegations or concerns (no matter how small) may be made against a member of staff, a volunteer, a governor, a pupil, parent or other person connected to the school. Safeguarding allegations or concerns against staff will be dealt with according to the statutory guidance set out in Part 4 of KCSiE and local authority procedures. It will be followed in respect of all cases in which it is alleged that a teacher or member of staff (including a volunteer) has:

- behaved in a way that has harmed a child or may have harmed a child.
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates they may pose a risk of harm if they work regularly or closely with children.
- behaved or may have behaved in a way that indicates they may not be suitable to work with children Further information: Making barring referrals to the DBS - GOV.UK (www.gov.uk).

Staff and volunteers who hear a safeguarding allegation or concern (no matter how small) against another member of staff or volunteer must immediately report the matter to the DSL or Headteacher, unless the DSL is the person against whom the allegation is being made, in which case the allegation must be made to the Head teacher. If the accused is the headteacher it should be reported to the Chair of Governors. In the case of alleged serious harm, the DSL/Headteacher must inform the police immediately. Where there is a conflict of interest in reporting a matter to the head teacher or DSL the school whistleblowing procedures should be followed.

In the event of a safeguarding allegation being made against a member of staff, the DSL will immediately, and without further investigation, refer the matter to the LADO. **The CEO and Trust DSL must also be informed**. It is essential that all information pertinent to the case be communicated to the LADO as the failure to pass on a critical piece of information could materially affect the advice given. The LADO's advice will be sought in borderline cases. The LADO's role is not to investigate the allegation but to ensure an appropriate investigation is carried out. Where an investigation by the police or local authority children's social care services is unnecessary, the LADO's advice should be taken as to how the allegation should be dealt with; it is sometimes appropriate that school leaders (or BEBCMAT) should investigate the allegation. and, as required, deal with the member of staff in accordance the School's disciplinary procedure. The adult to whom the allegation/concern relates should not be informed without the explicit consent of the LADO.

If there is a conflict of interest in reporting a safeguarding concern to the DSL/Head teacher, or in the event of an allegation being against the Head teacher or a member of the Governing Body, the Chair of Governors or, in their absence, the Lead Governor for Safeguarding (LGS), should be contacted immediately to determine whether the details of the allegation are sufficient to warrant an investigation.

If there is reason to suppose abuse could have occurred, the Chair of Governors in conjunction with the Trust will take appropriate action. This action will include an immediate referral to the LADO who will provide further advice on how to manage the situation appropriately.

Advice should always be sought from the LADO in any safeguarding allegation. However, the member of staff who an allegation has been made against should be advised to contact their trade union representative, if they have one. The School/Trust will normally appoint a member of staff to keep the person informed of the likely course of action and the progress of the case and offer support where appropriate.

If the allegation or concern relates to a member of supply staff, the agency will be notified and fully involved. Allegations or concerns against a member of staff who no longer works at the school (and historical allegations) will be referred to the police. The parents of the pupil will be informed of the allegation as soon as possible, unless external agencies such as the police advise otherwise. Parents will be kept informed of the progress of the case, including the outcome of any disciplinary process through the normal school procedures.

Low level concerns

BEBCMAT promotes an open and transparent culture in which all concerns about adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. This includes sharing any concerns about adults, no matter how small, responsibly and with the right person, recorded and dealt with appropriately. Doing so should encourage an open and transparent culture; enable the school to identify any inappropriate,

problematic or concerning behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the Trust ethos and values.

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the local authority harm threshold. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and does not meet the harm threshold or is otherwise not considered serious enough to consider a referral to the LADO. If in any doubt regarding information shared about a member of staff as a low-level concern meets the harm threshold then the school will consult with the LADO.

Examples of behaviour regarded as a low-level concern could include, but are not limited to:

- being over friendly with children.
- having favourites.
- taking photographs of children on their mobile phone.
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- using inappropriate sexualised, intimidating or offensive language.
- engaging with pupils on social media platforms.

When dealing with low level concerns all schools will follow the staff code of conduct, behaviour policies and safeguarding policies; ensuring that procedures are implemented effectively, and appropriate action is taken in a timely manner to safeguard pupils. Low level concerns must be reported to the DSL who will inform the Head teacher of such concerns. Alternatively, if preferred, a concern might be reported directly to the Head teacher. If the low-level concern relates to the DSL, then such concerns should be reported directly to the Head teacher. If the concern is about the Headteacher then this should be referred to the Chair of Governors.

Reports of low-level concerns will be recorded in writing by the DSL, noting who raised the concern (unless wishing to remain anonymous, which should be respected as much as is reasonable), details of the concern, the context in which the concern arose, and the action taken. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold (LADO).

Consideration should also be given to whether there are wider cultural issues within school that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again. Reports about supply staff and contractors should be notified to their employers so any potential patterns of inappropriate behaviour can be identified.

Whistleblowing

All staff are required to report any concerns to the DSL/Head teacher about poor or unsafe safeguarding practices in school; potential failures to properly safeguard the welfare of pupils or any action by staff or pupils that represent a safeguarding risk. If a member of staff feels unable to share a concern with the Headteacher then they should contact the Chair of the Governors. Staff should be

aware that the NSPCC whistleblowing advice line – 0800 800 5000 / help@nspcc.org.uk – is available for staff who do not feel able to raise safeguarding concerns internally.

The Trust's whistleblowing policy is available on the Trust and school websites. It should also be displayed prominently in key places within the school building.

Self-Reporting

If you have been involved in an accident, incident, conversation or situation which has made you feel uncomfortable, that might have been misinterpreted, or you feel might be used against you, report this to the DSL. This might include:

- A suggestive comment from a pupil or accidental or embarrassing physical contact.
- A misunderstanding.
- A confrontation.
- An instance where physical restraint or reasonable force was necessary.
- Situations in which staff have become aware pupils have requested social media profiles or have been named by pupils on social media platforms.

All school staff must be made aware of and adhere to the school's policy in relation to conduct and presence on social media. Further information regarding this will be found in the school's Online Safety policy.

The use of Reasonable Force

It is important to allow children to do what they can for themselves, but depending on age and circumstances (i.e., a child who is hurt, who needs instruction in the use of a particular instrument/piece of equipment, safety issues such as the need to prevent a child hurting themselves or others), it may be necessary for some physical contact to take place.

In April 2026, the DfE published the following guidance: Restrictive interventions, including use of reasonable force, in schools - Guidance for schools in England. This can be found on the www.gov.uk website.

This guidance informs our approach, a summary of which can be read below. For further information, please read our Behaviour Policy.

1. Restrictive interventions should never be used as part of routine behaviour management and are used only as a last resort. Rather, prevention is the priority including use of behaviour support planning and de-escalation techniques.
2. Any intervention must be lawful, necessary, reasonable and proportionate to the risk (e.g. risk of imminent harm) and used for the shortest possible time.
3. The guidance distinguishes between: lawful removal from a classroom, supervised spaces used to reduce risk and seclusion that prevents a pupil from leaving. Seclusion should not be used as a punishment or behaviour management strategy and requires careful justification and safeguards.
4. Significant incidents involving restrictive interventions will be recorded and reported as soon as possible by staff members involved. These records will be analysed by the DSL and the Behaviour Lead in order to establish any lessons learned and how to minimise the need for such interventions in future. Governors will also have oversight of this process with the aim being to entirely reduce any need for such interventions.

5. Parents/carers will be informed and there will opportunity for a debrief with staff and child/ren involved whereby (where appropriate) restorative meetings can be held to restore relationships.
6. The incident will not be reported to a parent if it is considered that doing so would be likely to result in significant harm to the pupil. If that is the case, or if there is no parent of the pupil to whom the incident could be reported, then the incident must be reported to the local authority where the pupil normally lives.

Children with SEND may experience restrictive interventions differently and therefore the SENDCo will work with staff to ensure personalised behaviour support plans and reasonable adjustments (under the Equality Act) are implemented pro-actively to reduce any need for restrictive interventions.

Appendix 5 - Definitions

The terms “children and child” refer to anyone under the age of 18.

Safeguarding and the protecting the welfare of children is defined as:

- Providing help and support to meet the needs of children as soon as problems emerge.
- Protecting pupils from maltreatment, whether that is withing or outside the home, including online.
- Preventing the impairment of pupils’ mental and physical health and development.
- Ensuring that pupils grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all pupils to have the best outcomes.

Consent is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16. However, the age of consent for sharing nude or semi-nude images is 18.

Sexual violence refers to the following offences as defined under the Sexual Offences Act 2003

Rape: A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their 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 they intentionally penetrate the vagina or anus of another person (B) with a part of their 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 they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if they intentionally cause 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.

Sexual harassment refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a pupil’s dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.

Sexual “jokes” and taunting.

Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying images of a sexual nature.

Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:

- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Sharing unwanted explicit content.
- Up-skirting.
- Sexualised online bullying.
- Unwanted sexual comments and messages, including on social media.
- Sexual exploitation, coercion, and threats.

Up-skirting refers to the act, as identified the Voyeurism (Offences) Act 2019, of taking a picture or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Up-skirting is a criminal offence. Anyone, including pupils and staff, of any gender can be a victim of up-skirting.

Similarly, 'Downblousing' refers to the using of a mobile camera or camera to take photos down a person's blouse, shirt, or dress in order to capture an image of their breasts, chest or underwear. This is usually done without the persons knowledge or consent.

Consensual and non-consensual sharing of nude and semi-nude images and/or videos, colloquially known as "sexting", is defined as the sharing between pupils of sexually explicit content, including indecent imagery. For the purposes of this policy, "indecent imagery" is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing
- A child touching themselves in a sexual way
- Any sexual activity involving a child
- Someone hurting a child sexually
- Sexual activity that involves animals.

Appendix 6 - Acronyms

Acronym	Long Form	Description
CCE	Child Criminal Exploitation	Where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence
CLA/ LAC /CIC	Children Looked After or Children in Care	Children who are in the care of the local authority, either in residential care or a foster placement for a period of longer than 24 hours
CME	Child Missing from Education	Where the school does not know the whereabouts of a child who is missing from school.
CSC	Children's Social Care	The branch of the Local Authority that deals with children's social care
CSE	Child Sexual Exploitation	Where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any sexual activity in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and /or through violence or the threat of violence
DBS	Disclosure and Barring Service	The service that performs statutory check of criminal records for people who wish to work with children and vulnerable adults either through paid employment or a voluntary basis
DfE	Department for Education	The national government department with the responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England
DPO	Data Protection Officer	The appointed person in a school or trust with the responsibility for overseeing the responsible use of data within the organisation and ensure data is handled in line with the Data Protection Act
DSL	Designated Safeguarding Lead	The member of the senior leadership team who is responsible for the strategic leadership fand quality assurance of safeguarding across a school or trust
DDSL	Deputy Designated Safeguarding Lead	The designated safeguarding leads deputy who is trained to the same standard and can make decisions regarding child protection cases within a school
EEA	European Economic Area	The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland
EHCP	Educational Health and Care Plan	A funded intervention plan which coordinates the educational, health and social needs for pupils who have significant needs that impact on

		their learning and access to education. The plan identifies any additional support
EHA	Early Help Assessment	An Early Help Assessment is a tool that helps to identify and address the needs of children and their families. It involves a lead practitioner who works with the child and their parent or carer, with their consent to gather and analyse information about their situation. The assessment leads to a family plan that outlines the goals and actions to improve the outcomes for the child and family.
ESFA	Education and Skills Funding Agency	Department for Education with accountability for funding education and skills training for children, young people and adults
FGM	Female Genital Mutilation	A procedure where the female genital organs are injured or changed. There is no medical reason for doing this
UK GDPR	UK General Data Protection Regulations	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent
HBA	Honour Based Abuse	So-called “honour-based” abuse or violence encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including FGM, forced marriage and practices such as breast ironing
HMCTS	HM Courts and Tribunal Service	HMCTS is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive, sponsored by the Ministry of Justice.
IICSA	Independent Inquiry into Child Sexual Abuse	The IICSA is analysing case files from the DBS to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand the institutional responses to these behaviours.
ITT	Initial Teacher Training	A programme of training within schools to achieve qualified teacher status
KCSiE	Keeping Children Safe in Education	Statutory guidance setting out schools and colleges’ responsibilities to safeguard and promote the welfare of children. This policy refers to KCSiE 2025 (the most recent guidance). Any policy update will be duly amended and referenced. Throughout this policy KCSiE 2025 is referred to as KCSiE.
LA	Local Authority	A local government agency responsible for the provision of a range of local services including education.
LADO	Local Authority Designated Officer	A LADO is the designated person employed by the LA to respond to allegations of abuse against adults who work with children. Every LA must have a LADO in place who is responsible for co-ordinating the

		response to the allegation. The LADO works with the employer, the police, and other agencies to ensure a fair and thorough investigation.
LGBTQ+	Lesbian, Gay, Bisexual, Transgender and Queer	Term relating to a community of people who share protected characteristics covered by the Equalities Act
MAT	Multi-Academy Trust	An educational trust set up to provide support and collaboration across a number of schools
NRM	National Referral Mechanism	The NRM is a framework for identifying and referring potential victims of modern slavery and to ensure they receive the appropriate support.
NPCC	National Police Chiefs' Council	NPCC is a national coordination body for law enforcement in the UK and the representative body for British police chief officers
PCLA	Previously Children Looked After	Children who have been in the care of the Local Authority but ceased to be, because they were adopted (or became subject to a child's arrangements order or a special guardianship order)
PSHE	Personal, Social and Health Education	A non-statutory subject which forms part of the personal development curriculum and allows pupils to learn about themselves, other people, rights, responsibilities and relationships
PHE	Public Health England	An executive agency of the Department of Health and Social care which aims to protect and improve the nation's health and wellbeing
QTS	Qualified Teacher Status	A requirement in England to work as a teacher in ether a state or special school.
RSHE	Relationship, Sex and Health Education	A statutory component of the curriculum covering primary and secondary education sectors, that teaches pupils about different relationships, consent, the promotion of healthy relationships and sexual health which is age appropriate.
SCR	Single Central Record	A statutory secure record of all employees, volunteers and regular visitors to the school which documents evidence that checks have been completed to ascertain their suitability to work with children. For employees this should evidence records of pre-employment checks
SENDCo	Special Educational Needs and/or Disabilities Coordinator	A statutory role within schools maintaining oversight and coordinating the school's special educational needs policy and provision to support pupils with special educational needs
SEND	Special Educational Needs and Disabilities	A term to describe pupils who have specific needs which may be a barrier to their learning. Pupils who are identified as SEND should have clear recommendations for school staff which allow them to access their learning.

SLT	Senior Leadership Team	Senior members of school staff responsible for strategic decision making with responsibilities for specific areas within the school.
TRA	Teacher Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching professions
VSH	Virtual School Head	The named person within the Local Authority with responsibility for promoting the education and welfare of looked after children, previously looked after children, children in kinship care and children with a social worker.

Appendix 7: Additional Support from Ella Savell-Boss Ltd.

As mentioned previously in this policy, The Trust have bought into a package of support from Ella Savell-Boss Ltd. - A safeguarding training and consultancy provider.

This support includes:

- **Access to the online resource hub** – each school will receive their own login as Principal and DSL.
- **Telephone and email support** – available for advice, guidance or second opinions. School staff can call 01253 966 663 or email both beth@savellboss.co.uk and ella@savellboss.co.uk. Please note. BEBC MAT protocol is that prior to seeking support from the consultants, the staff member should ensure the relevant forms are completed and sent through to Amanda Stringer (The Trust Safeguarding Lead).
- **KCSIE 2026 staff training session** including a recording and presentation slides. In addition, accompanying shorter videos for DSLs to share with their staffing team that outline different safeguarding issues. These can be used for staff training throughout the year.
- **Governor safeguarding training** – arranged through the Trust to ensure all governors have received up to date training in line with KCSIE 2026 and their responsibilities.
- **Weekly safeguarding briefing emails** – with key updates, reminders and useful insights.
- **Safeguarding Networking Meetings** – currently booked in for all DSLs in December 2026, March 2027 and June 2027.

To find out more about the consultancy providers, please visit their website: www.ellasavellboss.co.uk