Campion School
The best in everyone™
Part of United Learning

# Safeguarding Policy

Review Frequency – Annually

Review Date – 1st September 2026

Person responsible for the Policy – Kirsty Johnson

Ratified by Governors – 16th September 2025

# United Learning – Safeguarding Children and Child Protection Policies and Procedures

| Document Control | |
|---|---|
| Document Title: | Safeguarding Children and Child Protection Policies and Procedures |
| Summary of Changes from Previous Version: | |
| Name of Originator/Author (including job title): | Frazer Smith – Head of Safeguarding (United Learning) |
| Target Audience: | Designated Safeguarding Leads |
| Review By Date: | 01.09.26. |
| Date Issued: | 01.07.25. |

## 1. Scope

This policy applies to all United Learning academy schools.

## 2. Implementation

The new version of this policy must be implemented by 1st September 2025

## 3. Summary of Requirements

Schools are required to amend this template policy, personalising and localising it as indicated. The policy must be approved by the Local Governing Body and published on the school website.

# CHILD PROTECTION AND SAFEGUARDING POLICY

## UNITED LEARNING TRUST

## Campion School

## September 2025

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| Date of last central office review: | 9th July 2025 | Review Period: | 1 year (minimum) |
| Date of next central office review: | | Owner: | Kirsty Johnson, Assistant Principal, Designated Safeguarding Lead |
| Date of next school level review: | 1st September 2026 | | |
| Type of policy: | United Learning Policy | Group Board: | Group Board approves United Learning Template Policy |
| | | Local Governing Body: | Approves completed school policy |

| The Policy will be reviewed annually, as set out below: | |
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| Policy reviewed centrally | 9th JULY 2025 |
| Policy tailored by individual schools | 8th September 2025 |
| Policy ratified by Local Governing Body | 16th September 2025 |
| Policy approved by the Group Board | [● JULY 2025] |
| Implementation of Group Policy | [● INSERT] |

**KEY EXTERNAL CONTACT DETAILS**

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| **Local Authority Designated Officer** | Andy Smith<br>TEL: 07850 854309<br>EMAIL: LADOConsultations@NCTrust.co.uk |
| **Local Authority Children's Social Services** | TEL: 0300 126 7000<br>EMAIL: https://northamptonshire self.achieveservice.com/en/service/Make_a_children_s_referral_to_Northamptonshire_s_<br>MASH OUT OF HOURS EMERGENCY DUTY TEAM TEL: 01604 626938<br>http://www.northamptonshirescb.org.uk/worried-about-a-child-/ |
| **Multi-Agency Safeguarding Hub** | TEL: 0300 126 7000<br>EMAIL: MASH@nctrust.co.uk |
| **Support and Advice about Extremism** | **Police**<br>**Northamptonshire Police**<br>TEL: EMERGENCY: 999; NON-EMERGENCY NUMBER: 101<br>EMAIL: mail@northants.gov.uk<br>**Local Authority** |

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| | **West Northamptonshire Local Authority**<br>TEL: 0800 011 3764<br>EMAIL: prevent@northants.pnn.police.uk<br>• Phone: 101 ext. 341166<br>• Northants Police Online - Tell us about possible terrorist activity<br>• ACT Early Support Line – Phone: 0800 011 3764 (9am to 5pm every day)<br><br>If you've seen or heard something that could potentially be related to terrorism, trust your instincts and report it. Your actions could save lives.<br><br>• Report online<br>• Anti-terror Hotline – 0800 789321<br><br>**Department for Education**<br>NON-EMERGENCY NUMBER: 020 7340 7264<br>EMAIL: counter.extremism@education.gov.uk<br>CONTACT FORM:<br>https://report-extremism.education.gov.uk/<br>Anti-terrorist hotline: 0800 789 321 |
| **NSPCC's what you can do to report abuse dedicated helpline** | TEL: 0808 800 5000<br>EMAIL: help@nspcc.org.uk |
| **Disclosure and Barring Service** | **Disclosure Service**<br><br>ADDRESS: DBS customer services, PO Box 3961, Royal Wootton Bassett, SN4 4HF, United Kingdom<br>TEL: 03000 200 190<br>EMAIL: customerservices@dbs.gov.uk<br><br>**Barring Service**<br><br>ADDRESS: DBS customer services, PO Box 3961, Royal Wootton Bassett, SN4 4HF, United Kingdom<br>**TEL:** 03000 200 190 |
| **Teaching Regulation Agency** | TEL: 0207 593 5393<br>EMAIL: misconduct.teacher@education.gov.uk |
| **OFSTED (Concerns)** | TEL: 0300 123 4666 |

**KEY SCHOOL CONTACT DETAILS**

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| **United Learning Trust (ULT)** | **Chair of ULT**<br>Dame Reena Keeble<br>EMAIL: company.secretary@unitedlearning.org.uk<br><br>**Director of Trust Safeguarding**<br>Darren Ellison-Lee, Director of Primary Education<br>EMAIL: [● INSERT]<br><br>**Regional Director (United Learning)**<br>Christopher Clyne<br>TEL: 07980043472<br>EMAIL: christopher.clyne@unitedlearning.org.uk<br><br>**Head of Safeguarding**<br>Frazer Smith<br>TEL: 07826934336<br>EMAIL: frazer.smith@unitedlearning.org.uk<br><br>**United Learning Safeguarding Officer**<br>Sara Jaber<br>EMAIL: sara.jaber@unitedlearning.org.uk |
| **Local Governing Body (LGB)** | **Chair of LGB**<br>Pamela Hutchison<br>EMAIL: p.hutchison@campionschool.org.uk<br><br>**Nominated Safeguarding Governor of LGB**<br>Bally Sandu<br>EMAIL: b.sandhu@campionschool.org.uk<br><br>**Nominated E-Safety Governor of LGB**<br>Bally Sandu<br>EMAIL: b.sandhu@campionschool.org.uk |
| **Designated Safeguarding Lead (DSL) and Deputy Designed Safeguarding Leads (DDSLs)** | **Main DSL for the School**<br>Kirsty Johnson<br>TEL: 01604 833906<br>EMAIL: K.Johnson@campionschool.org.uk<br><br>**Deputy DSL**<br>Sharon Hammond<br>TEL: 01604 833906<br>EMAIL: s.hammond@campionschool.org.uk<br><br>**Designated E-Safety Lead**<br>Kirsty Johnson<br>TEL: 01604 833906<br>EMAIL: K.Johnson@campionschool.org.uk |

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| **Designated Teachers for Looked After Children** | Kirsty Johnson<br>TEL: 01604 833906<br>EMAIL: k.johnson@campionschool.org.uk |
| **Interim Principal** | Kim Bradley-Smith<br>Tel: 01604 833900<br>EMAIL: k.bradley@campionschool.org.uk |

**SCOPE**

This policy applies to Campion School ("the school") United Learning Trust requires the School's Local Governing Body to review and update this policy annually (as a minimum). This policy is available on the school website. This policy is ratified annually by the United Learning Group Board.

This policy has regard to the following guidance and advice, as amended from time to time (and any supplemental guidance/advice referred to therein):

- Keeping Children Safe in Education (DfE, 2025)
- Disqualification under the Childcare Act 2006 (DfE, August 2018)
- What to do if you're worried a child is being abused: advice for practitioners (HM Government, 2015)
- UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people (Updated 2024)
- Mental Health and Behaviour in Schools (DfE, November 2018)
- Preventing and Tackling Bullying (DfE, July 2017)
- Working Together to Safeguard Children (DfE, Current edition/publication)
- Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (DfE, May 2024)
- Revised Prevent Duty Guidance: for England and Wales (Home Office, April 2023)
- The Prevent duty: safeguarding learners vulnerable to radicalisation (DfE, updated September 2023)
- Relationships education, relationships and sex education (RSE) and health education (DfE, 2025)
- Equality Act (2010) – Including Public Sector Equality Duty
- The Human Rights Act (1998)

This policy also takes into account the procedures and practice of West Northamptonshire Council Safeguarding | West Northamptonshire Council . The Local Governing body and their senior leadership teams, especially their designated safeguarding leads, will:

- make themselves aware of and follow their local arrangements (including the local criteria for action and the local protocol for assessment)
- ensure this is reflected in their own policies and procedures
- supply information as requested by the three safeguarding partners
- work with social care, the police, health services and other services to promote the welfare of children and protect them from harm

**POLICY STATEMENT**

Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the **best interests** of the child. If children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

The school will ensure they facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Staff working with children should have an attitude of '**it could happen here**' and no reports in their school it does not mean it is not happening. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart. Where there is a safeguarding concern the school will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems are in place for children to express their views and give feedback.

**CONCERNS ABOUT A CHILD**

The school always has a duty to consider the best interests of the student and take action to enable all students to achieve the best outcomes. Safeguarding and promoting the welfare of children is **everyone's** responsibility. Everyone has a role to play in identifying concerns, sharing information and taking prompt action in accordance with this policy.

The school has arrangements for listening to children and providing early help and processes for children to raise concerns about themselves or their peers. Details of these arrangements are for children to report immediately to a member of the pastoral team such as their tutor or Head of Year. If they are not available, students can see other members of the safeguarding team, whose pictures are on the safeguarding poster which is in every classroom. Students can also speak with any member of staff who will listen and record and ensure the students are safe.

Staff should expect to support social workers and other agencies following any referral.

**Definitions of safeguarding, abuse, neglect and exploitation**

Safeguarding and promoting the welfare of children is defined as providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment,
whether that is within or outside the home, including online; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

Abuse is a form of maltreatment of a child. Somebody may abuse, exploit, or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them, by other children, or, more rarely, by others (e.g. via the internet).

Technology is a significant component in many safeguarding and well-being issues. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. In many cases abuse will take place concurrently via online channels and in daily life. They may be abused by an adult or adults or by another child or children. Abuse and exploitation can be:

- physical abuse
- emotional abuse
- sexual abuse; and/or
- neglect.

All staff should be aware of indicators of abuse, neglect and exploitation. Staff are referred to **Appendix 1** of this policy for further detail of the types of abuse and possible signs of abuse. Staff should always be vigilant and raise any concerns with the DSL or DDSL.

**PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD**

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.

If staff suspect or hear an allegation or concern of abuse, neglect or exploitation from a child or any third party, they must follow the relevant procedure below. All staff should:

- listen carefully;
- avoid asking leading questions;
- reassure the individual that the allegation/complaint will be taken seriously;
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain to the child that staff will only share the information with those who need to know to help the child. All staff should explain next steps and who the information will be passed to;
- a victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment, nor should a victim ever be made to feel ashamed for making a report.

**All** concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

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.

- The record should include the date, time and place of the conversation and detail of what was said and done by whom and this should be logged onto CPOMS within two hours.
- Where a report includes online elements or the sharing of images, staff are **reminded not to view or forward any illegal images** of a child but note what has been reported. Further guidance can be found in the Sharing nudes and semi-nudes: advice for education settings working with children and young people"}].
- Records should be kept factual.

Where there is a safeguarding concern, the school will ensure the student's wishes and feelings are taken into account wherever possible and will work with them (and their families where appropriate) when determining what action to take and what services to provide. This is particularly important in the context of harmful sexual behaviours, such as sexual harassment and violence. The school manages this by having key people for students to report incidents to such as their form tutor, Head of Year or any member of staff they feel comfortable with. Students are able to complete a written account or verbal account to express their view, which is uploaded to CPOMs. The school also allocates the DSL to support the alleged perpetrator and the DDSL to the alleged victim. If appropriate, a risk assessment is completed which is then shared with parents/carers and the child, where there is an opportunity for feedback.

**Information sharing:** Safeguarding information will often be special category personal data and the school will comply with data protection law and have due regard to the Department for Education's guidance 'Information sharing - Advice for practitioners providing safeguarding services to children, young people, parents and carers' (DfE, May 2024), and the relevant provisions of KCSIE when sharing such data. Personal information may be shared by the school with a third party (such as the police or local authority) without consent if there is a lawful basis to do so such as where doing so is in order to promote a child's welfare or where their safety may be at risk. This is because the Data Protection Act 2018 includes 'safeguarding children and individuals at risk' as a condition that allows information to be shared without consent in certain circumstances. Any decision to share or withhold information will be recorded together with the reasons for it and who the information has been given to. The school operates its processes with the best interests of the student at its heart.

Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation, and in promoting children's welfare, including their educational outcomes. Schools have clear powers to share, hold and use information for these purposes. The school will ensure relevant staff comply with the relevant data protection principles when processing and sharing personal information, as provided for in the Data Protection Act 2018 and the UK GDPR. As part of this, the school will ensure that members of staff:

- are confident of the processing conditions which allow them to process and share information for safeguarding purposes, including information which is 'special category personal data'.
- understand that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data without consent in certain circumstances.
- Do not provide pupils' personal data where the sharing does not comply with data protection law.

When sharing information staff will ensure they comply with group data protection policies and keep records of disclosures as required by these policies. These are available to staff via the United Learning Policies Portal. For further information about how the school processes pupil personal data, please see the privacy notice on the website

*https://www.campionschool.org.uk/Portals/0/adam/Files/vHTzHY1GokOjEQZf09AOVw/Files/GDPR%20(General%20Data%20Protection%20Regulation)/GDPR_Privacy_notice_-_Appendix_B_-_pupil_and_parent_-_Academy_October_2024.pdf*

**What staff should do if they have concerns about a child**

If staff (including governors, agency staff and volunteers) have any concerns about a child's welfare they should act immediately and should speak with the School's DSL or DDSL. If, in exceptional circumstances, the DSL or DDSL is not available, this should not delay appropriate action being taken and staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the DSL or DDSL as soon as is practically possible.

The DSL will consider the appropriate action to take in accordance with the threshold document published by the school's local safeguarding partners. Options will include:

- managing any support for the child internally via the school's own pastoral support processes;
- making an early help assessment; or
- making a referral for statutory services and / or
- making a referral to the police.

If a child's situation does not appear to be improving, the DSL (or the person that made the referral) should consider following local escalation procedures to ensure their concerns have been addressed and to ensure that the child's situation improves.

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision, whether this is when problems are first emerging, or where a child is already known to local authority children's social care (such as on a child in need or child protection plan). Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing (in line with this policy).

**Early Help**

Any child may benefit from early help but all staff should be particularly alert to the potential need for early help for a child 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)

• has a mental health need

• is a young carer

• is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines

• is frequently missing/goes missing from education, home or care,

• has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.

• is at risk of modern slavery, trafficking, sexual and/or criminal exploitation

• is at risk of being radicalised or exploited

• 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 so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage

• is a privately fostered child.

All staff should be aware that behaviours linked to drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk.

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

In the first instance, staff who consider that a student may benefit from early help should discuss this with the School's DSL or DDSL. If early help is appropriate, the DSL will generally lead on liaising with relevant agencies and setting up inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under constant review and consideration given to a referral to children's social care if the student's situation does not appear to be improving or is getting worse.

**What staff should do if a child is suffering, or is likely to suffer from harm**

If staff (including governors, agency staff and volunteers) believe that a child is suffering, or is likely to suffer from harm, or is in immediate danger it is important that an **immediate** referral to West Northamptonshire Council children's social care (and the Police if appropriate) is made in accordance with the West Northamptonshire Council's referral process. Anyone can make a referral. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important to provide as

much information as possible as part of the referral process, to enable a contextual approach (see further below re Contextual Safeguarding).

The school's local safeguarding partners are NCSP and the locally agreed safeguarding arrangements can be found: Home - Northamptonshire SCP

For any student at off-site provision, Campion's safeguarding practices will be followed and any incident will be immediately reported to the DSL or to the police, if an emergency or where informing Campion's DSL would delay support to the child. Campion School safeguarding team will carry out safeguarding checks termly at any alternative / off-site provision. Children that are engaged in close one-to-one teaching will have the door open.

**What staff should do if a child is seen as at risk of radicalisation**

Staff should follow the school's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. This may include a referral to Channel or children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999 or email prevent@northants.pnn.police.uk or phone 101 then ext 341166. Advice and support can also be sought from children's social care. The school, in recognition that students may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the Police) of the potential risk in the local area. Such risk assessments are discussed with the Head, DSL or DDSL and governors responsible for safeguarding to ensure the school's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised. See further below for more information on radicalisation. Further guidance can be found in the Revised Prevent duty guidance: for England and Wales April 2021.

The school, in recognition that students may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the Police) of the potential risk in the local area. Such risk assessments are discussed with the Head, DSL or DDSL and Bally Sandhu, governor responsible for safeguarding to ensure the school's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised.

See further below for more information on radicalisation. Further guidance can be found in the Revised Prevent duty guidance: for England and Wales April 2021.

**What staff should do if they discover an act of Female Genital Mutilation ('FGM')**

All staff should speak to the DSL or DDSL about any concerns about FGM. Teaching staff have a separate duty to report to the Police cases where they discover that an act of FGM appears to have been carried out on a girl under the age of 18. All staff are referred to Appendix 1 of this policy for the procedure to be followed where they suspect or discover that a student may be at risk of FGM.

**What staff should do if a child goes missing from education**

**What staff should do if a child goes Missing from Education/Children Absent from Education**

Children missing/absent from education, particularly repeatedly and/or for prolonged periods, and children missing education (unexplainable and/or persistent absences from education) can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school's or college's unauthorised absence procedures and children missing education procedures.
The school's procedures for unauthorised absence and for dealing with children who go missing/absent from education are: 12

• If a child is not in school for 3 days without contact from home then a home visit is arranged

• If a child is not in school for 5 days despite contact from home then a home visit is arranged

• If a child has a Child Protection concern then normally a visit on the same day happens

• The concern is logged with the Local Authority as CME Detail can also be found at Appendix 1 of this policy. The school will report to West Northamptonshire Council if a student who fails to attend school regularly or has been absent from school without the school's permission for a continuous period of 10 school days or more. Further detail can also be found at Appendix 1 of this policy.

The school will report to West Northamptonshire Council a student who fails to attend school regularly or has been absent from school without the school's permission for a continuous period of 10 school days or more.

**Elective Home Education**

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, the school will try to work together with the local authority and key professionals to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker. The school will inform the local authority of all deletions from the admissions register when a child is taken off roll.

**What staff should do if they have concerns about another staff member (including supply staff, volunteers and contractors)**

If staff have safeguarding concerns, or an allegation is made about another staff member posing a risk of harm to children, then this should be referred to the Interim Principal. Where there are concerns/allegations about the Interim Principal, this should be referred to the Chair of the LGB and Head of Safeguarding. In the event of concerns/allegations of abuse being made, staff are referred to the procedures below regarding managing allegations of abuse against staff (including supply staff, volunteers and contractors).

**What staff should do it they have concerns about safeguarding practices in the school**

Where staff have concerns about poor or unsafe practices and potential failures in the school's safeguarding regimes, these should be raised in accordance with the school's whistleblowing procedures which can be found on the website. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the school, feel that their genuine concerns are not being (or have not been) addressed or are concerned about the way a concern is being handled, they may use other whistleblowing channels, such as the NSPCC whistleblowing helpline. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

**CHILD-ON-CHILD ABUSE (INCLUDING SEXUAL VIOLENCE AND SEXUAL HARRASSMENT)**

Safeguarding issues can manifest themselves via child-on-child abuse. Child-on-child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between two or more children and within children's relationships (both intimate and non-intimate). All staff working with children are advised to maintain an attitude of "it could happen here". Staff should recognise that even if there are no reports, it does not mean that child-on-child abuse is not happening, it may be the case that it is just not being reported

This is most likely to include, but may not be limited to:

- Abuse in intimate personal relationships between children;
- Bullying (including cyberbullying);
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- Sexual violence, such as rape assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- Sexual harassment, such as sexual comments, jokes and online sexual harassment, or misogynistic messages which may be stand alone or part of a broader pattern of abuse;
- The non-consensual sharing of indecent images*, especially around chat groups, and the sharing of abusive images, nudes, videos and pornography to those who do not want to receive it (see further below);
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element); and
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

The school recognises the gendered nature of child-on-child abuse (i.e. that it is more likely that girls will be ”victims” and boys “perpetrators”). Even if there are no reports in their school it does not mean it is not happening, it may be the case that it is just not being reported. As such, if staff have **any** concerns regarding child-on-child abuse, they should speak to their designated safeguarding lead (or deputy).

Child-on-child abuse can be associated with factors outside the school and can occur online and face-to-face between two or more children of any age or gender. The school therefore takes a contextual safeguarding approach to managing child-on-child abuse.

Child-on-child abuse is abuse and is never acceptable. The school takes a zero-tolerance approach. It should never be passed off or dismissed as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”.

The school takes the following steps to minimise the risk of child-on-child abuse:

Foster a culture of respect for others, in line with our key character value of respect
• Telling school Ethos – Every child is listened to
• ‘No hands on’ expectations around the school
• Zero tolerance approach to bullying
• Trained anti-bullying ambassadors
• PHSCE lessons around appropriate behaviour and relationships
• Assemblies on the theme of bullying, discrimination and sexual violence and harassment given by SLT
• Anti-bullying is every day (not just a week)
• Following our Anti-bullying Policy
• Non-teaching Heads of Year and Trained on-site counsellor are available in school
• The school operate a CCTV *Consensual image sharing, especially between older children of the same age, may require a different response. Whilst not abusive, children still need to know it is illegal, whilst nonconsensual sharing is illegal and abusive.

The school’s approach to pupil’s sharing nudes and semi-nudes images and or videos (also known as sexting or youth produced sexual imagery) is:
• All reports are taken seriously and reported to the DSL or DDSL immediately
• Student voice is taken
• Safeguarding procedures followed to ensure students are kept safe
• Students educated through PHSCE and assemblies, sexual harassment or sexual violence not to be passed off as ‘banter’, ‘part of growing up’ or ‘having a laugh’.
• Staff referred to the United Learning E-Safety Policy (available on the United Learning Hub)
• Support is given through check-ins and other adjustments to both victim and perpetrator

Where an issue of student behaviour or bullying gives ‘reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm’, staff should follow the procedures below rather than the School’s Anti-Bullying and Behaviour policies in the first instance:

**What to do if staff suspect that a child may be at risk or hears a report of child-on-child abuse**

For detailed information on what sexual violence and sexual harassment constitutes, important context to be aware of, related legal responsibilities for schools and colleges, advice on a whole school or college approach to preventing child-on-child sexual violence and sexual harassment and more detailed advice on responding to reports see the Department for Education's statutory guidance: ***Keeping Children Safe in Education (2024), Part 5 – Child-on-child sexual violence and sexual harassment***

The procedures set out below will be reviewed, at least annually, in light of an assessment of the impact and effectiveness of the policy. Response to a report

- Firstly, the student is re-assured they are being taken seriously and they are not making a problem. They should not be made to feel ashamed
- Normal safeguarding procedures are followed for a disclosure
- Where the report includes an online element, being aware of searching screening and confiscation advice (for schools) and UKCCIS sexting advice (for schools and colleges). The key consideration is for staff not to view or forward illegal images of a child.
- Check-ins are planned for both victim and perpetrator Risk Assessment
- When there has been a report of sexual violence, the DSL or deputy makes an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment is considered on a case by case basis. The risk and needs assessment considers: the victim, especially their protection and support, the alleged perpetrator; and all other children (and, if appropriate, adults, students and staff) at the school, especially any actions that are appropriate to protect them.
- Risk assessments are recorded (CPOMS – central drive) and are kept under review. At all times, the school actively considers the risks posed to all their pupils and students and putting adequate measures in place to protect them and keep them safe.
- The designated safeguarding lead (or a deputy) should ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required.

The school's initial response to a report from a child is important. How the school responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.

It is essential that **all** victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Abuse that occurs online should not be downplayed and should be treated seriously. All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

It is important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a member of school staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have **any** concerns about a child's welfare, they should act on them immediately rather than wait to be told.

All staff are trained to manage a report. Effective safeguarding practice includes:

• if possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible;

• not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;

• recognising that a child is likely to disclose to someone they trust: this could be **anyone** on the school staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;

• recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can memory and so children may not be able to recall all details or timeline of abuse;
• keeping in mind that certain children may face additional barriers to telling someone because of their disability, sex, ethnicity and/or sexual orientation;

• listening carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was;

• considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made;

• only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Schools should be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation;

• where the report includes an online element, being aware of searching screening and confiscation advice (for schools) and UKCIS guidance on Sharing nudes and semi-nudes: advice for education settings working with children and young people.

• informing the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report.

If a staff member has a concern that a child may be at risk of or experiencing abuse by another child, or that a child may be at risk of abusing or may be abusing other children, they should

discuss their concern with the DSL or DDSL without delay so that a course of action can be agreed.

The school recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust.

All concerns/allegations of child-on-child abuse will be handled sensitively, appropriately and promptly and will be investigated including consideration of the wider context in which it may have occurred (as appropriate). The school treats all children involved as being at potential risk and ensures a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it. **Immediate** consideration will therefore be given as to how best to support and protect all children involved/impacted.

The school will take into account the views of the child/children affected. Unless it is considered unsafe to do so, the DSL should discuss the proposed action with the child/children and their parents following appropriate liaison with children's social care. The school should manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so.

All children affected by child-on-child abuse will be supported by the pastoral teams and safeguarding team and support from external agencies will be sought, as appropriate. "Victims" will be reassured that they are being taken seriously and that they will be supported and kept safe. The school recognises that children with special educational needs and disabilities or certain health conditions can be more prone to peer on peer group isolation than other children and will consider extra pastoral support for those children, including access to The Bridge facility and School Counsellor.

A student against whom an allegation of abuse has been made may be suspended from the school during the investigation. The school will take advice from relevant local safeguarding partners on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all students involved including the alleged "victim" and "perpetrator". If it is necessary for a student to be interviewed by the Police in relation to allegations of abuse, the school will ensure that, subject to the advice of the relevant local safeguarding partners, parents are informed as soon as possible and that the students involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the school and advice will be sought as necessary from the relevant local safeguarding partners, such as children's social care and/ or the Police as appropriate.

**Reports concerning harmful sexual behaviour (including sexual violence and sexual harassment)**

Consideration of safeguarding all those children involved in the safeguarding report will be immediate. Following a report of sexual violence and/or sexual harassment the DSL will therefore consider the appropriate response. Important considerations will include:

- The wishes of the victim in terms of how they want to proceed;

- The nature of the alleged incident, including whether a crime may have been committed and/or whether harmful sexual behaviour has been displayed;
- The ages of the children involved;
- The developmental stages of the children involved;
- Any power imbalance between the children (e.g. is/are the alleged
- perpetrator(s) significantly older, more mature, confident and well known social
- standing? Does the victim have a disability or learning difficulty);
- If the alleged incident is a one-off or sustained pattern of abuse (NB. sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just
  be of a sexual nature);
- That sexual violence and sexual harassment can take place within intimate personal relationships between children;
- Any ongoing risks to the victim, other children, adult students, or school/college staff;
- Importance of understanding intra familial harms and any necessary support for siblings following incidents;
- Other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

When there has been a report of sexual violence, the DSL (or a deputy DSL) should make an immediate risk and needs assessment in respect of each child affected by the abuse. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the "victim";
- the alleged "perpetrator"; and
- the other children (and, if appropriate, staff) at the school.

The DSL will consider as part of the school's response, the context within which such incidents and/or behaviours occur and the importance of anonymity. Risk assessments will be recorded (either written or electronic) and kept under review. The DSL will consider the risks posed to all students and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the "victim" and alleged "perpetrator" and considerations regarding shared classes, sharing school premises and school transport. Any professional risk assessment will inform the school's approach.

The police will be informed of any harmful sexual behaviours including sexual violence and sexual harassment which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. A report to the police will generally be made in parallel with a referral to children's social care.

If the DSL decides to make a referral to children's social care and/or a report to the police against a "victim's" wishes, the reasons should be explained to the student and appropriate specialist support offered. The DSL or DDSL will also work closely with children's social care and other agencies are required to ensure any action taken under this policy does not jeopardise any statutory investigation and to discuss how the alleged "perpetrator", staff, parents and others will be informed of the allegations and what information can be disclosed bearing in mind the need to protect those involved and their anonymity.

Regardless of the outcome of any criminal process, including where a child is subject to bail, the DSL will liaise with the police and children's social care to ensure the welfare and safety of all children and update the risk assessments and ensure relevant protections and measures are in place for all children.

The school will consider whether disciplinary action may be appropriate for any child/children involved. Before deciding on appropriate action the school will always consider its duty to safeguard all children from harm; the underlying reasons for a child's behaviour; any unmet needs, or harm or abuse suffered by the child; the risk that the child may pose to other children; and the severity of the child-on-child abuse and the causes of it.

The DSL will ensure that where children move to another educational institution following an incident of child-on-child abuse, the new institution is made aware of any ongoing support needs and, where appropriate, any potential risks to other children and staff.

The school recognises that good record-keeping and monitoring of sexual violence and sexual harassment reports is essential and assists the school in meeting its Public Sector Equality Duty.

**Contextual Safeguarding**

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

## SAFEGUARDING CONCERNS AND ALLEGATIONS MADE ABOUT STAFF, INCLUDING SUPPLY TEACHERS, VOLUNTEERS AND CONTRACTORS

The school's procedures for managing concerns/ allegations against staff who are currently working in the school follows Department for Education statutory guidance and local safeguarding partners' arrangements and applies when staff (including supply staff, volunteers and contractors) have (or are alleged to have):

- Behaved in a way that has harmed a student, or may have harmed a student; and/or
- Possibly committed a criminal offence against or related to a student; and/or
- Behaved towards a student in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (including behaviour that may have happened outside school, that might make them unsuitable to work with children "transferable risk". Advice can be sought from the LADO in assessing transferable risk).

**Non-recent allegations**

Allegations against an adult that is no longer working/volunteering with children should be referred to the Police. Where it is known that the adult is still working/volunteering with children, all allegations (including historical/non-recent allegations of abuse) should be referred to the Police and the LADO in the local authority that the adult is working/volunteering.

Where an adult makes an allegation to a school that they were abused as a child, they should be advised to report the allegation to the police. Non-recent allegations made by a child, should be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. Abuse can be reported no matter how long ago it happened.

If an allegation is made against anyone working with children in the School, the School should not undertake their own investigation of allegations without prior consultation with the Local Authority 'designated officer' (LADO) or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the school may discuss informally with the Local Authority 'designated officer' (LADO) on a no-names basis (if local safeguarding procedures allow).

All allegations should be investigated as a priority to avoid any delay.

**Allegations that may meet the harms threshold**

1. All allegations which appear to meet the above reporting criteria are to be **reported straight away to the 'case manager'** who is the Interim Principal. Where the Interim Principal is absent or is the subject of the allegation or concern, reports should be made to Chair of the LGB and Head of Safeguarding. Where the Interim Principal is the subject of the allegation or concern, the Interim Principal must not be informed of the allegation prior to contact with Chair of the LGB, Head of Safeguarding and LADO, and if appropriate, children's social care and the police.

2. **Welfare of the child:** Where the case manager deems that a child has been harmed, or there to be an immediate risk of harm to a child, or if the situation is an emergency, the DSL (or DDSL) should contact Children's Social Care and, as appropriate (e.g. if there is evidence of a possible criminal offence), the Police immediately.

3. **Investigating and supporting the person subject to the allegation:** Before contacting the LADO, schools should conduct <u>basic</u> enquiries in line with local procedures to establish the facts and help determine if there is any foundation to the allegation, being careful not to jeopardise any future police investigation, such as:
   - Was the individual in the school at the time of the allegation?
   - Could they have come into contact with the child?

   Schools should establish what initial information the LADO will require, and if in doubt check with the LADO before undertaking any initial enquiries, to ensure not to prejudice the position.

4. The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. The designated officer should be informed within one working day of all allegations that come to the school's attention and appear to meet the criteria or that are made directly to the Police and/or children's social care.

5. All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed with the Police/LADO. The case manager will ensure that the individual who is subject of the allegation is informed as

soon as possible and given an explanation of the likely course or action, unless there is an objection by children's social care or the Police. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.

6. **Suspension:** The case manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The case manager will give due weight to the views of the LADO, their HR adviser, as well as the police and children's social care if relevant when making a decision about suspension. Where the individual is suspended, the case manager will ensure they know who their point of contact is in the school and shall provide them with their contact details.

7. **Support for the member of staff:** whilst the welfare of the child is paramount, appropriate welfare support should also be made for the member of staff. Information is confidential, and should not ordinarily be shared with other staff, children or parents not directly involved. See further guidance in KCSIE.

8. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the Police.

9. **Further investigation:** where further investigation is required, the LADO and case manager will agree how and by whom the further investigation will be undertaken.

10. The case manager will discuss with the designated officer whether a referral to the **Disclosure and Barring Service (DBS) and/or Teaching Regulation Agency (TRA)** should be made, noting the requirements of KCSIE. For instance:
    a. If: 1) the allegation is substantiated; and 2) the person is dismissed (including by an agency) or the school (or agency) ceases to use their services, or the person resigns or otherwise ceases to provide their services, then the employer has a legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

    b. The employer has a legal requirement to make a referral to the DBS where they remove an individual from regulated activity (or would have removed an individual had they not left), and they believe the individual has:
        i. engaged in relevant conduct in relation to children and/or adults,
        ii. satisfied the harm test in relation to children and/or vulnerable adults; or
        iii. been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.

    c. In a case involving serious professional misconduct by a teacher, the case manager must consider whether to make a referral to the TRA. In certain cases, the TRA will consider whether to prohibiting the individual from teaching.

11. Where the initial discussion leads to no further action, the case manager and the LADO should record the decision and justification for it; and agree on what information should be put in writing to the individual concerned and by whom.

12. On conclusion of the case, the case manager should review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to the school's safeguarding procedures or practices to help prevent similar events in the future. This should include issues arising from any decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The designate officer and case manager should consider how future investigations of a similar 98 nature could be carried out without suspending the individual.

13. For all other cases, where the allegation concluded to be either, unfounded, false, malicious or unsubstantiated the case manager (and if they have been involved the designated officer) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

14. **Settlement:** Compromise or settlement agreements **should not** be used where there are allegations which indicate the person poses a risk of harm or may not be suitable to work with children and will not prevent police and/or school investigation, or referral to the DBS or TRA where the criteria are met. Failure to do so is a criminal offence. The school will continue its investigation if the person leaves, resigns or ceases to provide their services. Schools should check the relevant provisions of KCSIE.

**Information sharing**

Staff should be mindful of the guidance set out in KCSIE in relation to sharing information between safeguarding partners during the course of the process of managing allegations against staff.

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

**Allegation outcomes**

Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. Substantiated allegations should be included in references, provided that the information is factual and does not include opinions (KCSIE). Low level concerns (see below) should not be included in references unless they relate to issues which would normally be included in a reference such as misconduct or poor performance (KCSIE).

If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager should consider whether the child and/or person who made the allegation is in need of help or may have been abused by someone else, in which case a referral to children's social care may be appropriate.

If an allegation is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a student who made it in accordance with the

school's behaviour policy; or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a student.

**Supply teachers and all contracted staff**

Where the school has to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency or business (referred to in this section as 'the agency'), they will ensure allegations are dealt with properly. They will liaise with the local authority designated officer (LADO) to determine a suitable outcome and discuss with the agency whether it is appropriate to suspend the supply teacher or redeploy them to another part.

Agencies should be fully involved and cooperate with any enquiries from the LADO, police and/or children's social care. The school will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process.

When using an agency, the schools will inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

**Governors**

If an allegation is made against a governor, schools should follow their own local procedures. Where an allegation is substantiated, they should follow the procedures to consider removing them from office.

**Organisations or individuals using school premises**

Schools and colleges may receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, schools and colleges should follow their safeguarding policies and procedures, including informing the LADO.

**CONCERNS THAT DO NOT MEET THE HARM THRESHOLD/LOW – LEVEL CONCERNS POLICY**

As part of their whole school approach to safeguarding, the school will ensure that they promote an open and transparent culture in which **all** concerns about all adults working in or on behalf of the school (including supply teachers, volunteers (including governors) and contractors) are dealt with promptly and appropriately.

The term 'low-level' concern does not mean that it is insignificant. 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
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour 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; or,

•humiliating children.

It is crucial that any such concerns, including those which do not meet the allegation/harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately.

**Sharing/reporting a concern**

Low-level concerns about a member of staff should be reported to the designated safeguarding lead (or deputy) Interim Principal or the Safeguarding Lead. Where a low-level concern is raised about the designated safeguarding lead, it should be shared with the headteacher or principal. If someone is unclear who they should share their concern with, they should share it with the United Learning Safeguarding Lead, who is part of the Central Office Team. Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is in fact serious enough to consider a referral to the LADO or meets the threshold of an allegation. The Safeguarding Lead should inform the Interim Principal of all the low-level concerns and in a timely fashion according to the nature of each particular low-level concern. The headteacher/principal should be the ultimate decision maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns and/or the role of the DSL in some schools/colleges, the Interim Principal may wish to consult with the DSL and take a more collaborative decision-making approach.

Where a low-level concern relates to a person employed by a supply agency or a contractor to work in a school or college, that concern should be shared with the designated safeguarding

lead (or deputy), and/or headteacher, and recorded in accordance with the school's low-level concern/staff code of conduct policy, and their employer notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

If the staff member sharing the concern does not wish to be named the school will respect this person's wishes as far as possible. However, there may be circumstances where the staff member will need to be named (for example where it is necessary in order to carry out a fair disciplinary investigation) and, for this reason, anonymity can never be promised to members of staff who share low-level concerns.

If schools and colleges are in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they should consult with their LADO.

**Self-Reporting**

Occasionally an adult may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, an adult may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the Code of Conduct. Self-reporting in these circumstances can be positive for a number of reasons: it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity; it demonstrates awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived; and, crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

**How should a low-level concern be responded to**

The Safeguarding Lead/Interim Principal should:

- speak to the person who raised the concern (unless it has been raised anonymously), regardless of whether a written summary, or completed low-level concerns form has been provided;
- review the information and determine whether the behaviour (i) is entirely consistent with the school's Code of Conduct and the law, (ii) constitutes a low-level concern, (iii) is serious enough to consider a referral to the LADO, or (iv) when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO/other relevant external agencies;
- where the Safeguarding Lead/ Interim Principal is in any doubt whatsoever, they should seek advice from the LADO;
- speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted);

Any investigation of low-level concerns should be done discreetly and, on a need-to-know basis.

Advice should be sought from Human Resources and legal services (where necessary) about next steps.

There are a number of potential outcomes e.g.

- If it is decided that the low-level concern in fact amounts to behaviour which is entirely consistent with the organisation's Code of Conduct and the law it will still be important for the DSL, DDSL, Interim Principal to inform the individual in question what was shared about their behaviour, and to give them an opportunity to respond to it; In addition, the DSL, DDSL. Principal/Headteacher should speak to the person who shared the low-level concern to provide them with feedback about how and why the behaviour is consistent with the organisation's Code of Conduct and the law.
- Some will not give rise to any ongoing concern and, accordingly, will not require any further action;
- Others may be most appropriately dealt with by means of management guidance and/or training;
- A low-level concern may require a conversation with the individual about whom the concern has been raised. This should include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate;
- Some low-level concerns may also raise issues of misconduct or poor performance;
- Some concerns may trigger the organisation's disciplinary, grievance or whistleblowing procedures, which should be followed where appropriate;
- A referral to the LADO as the school believes the threshold has been met.
- The school should exercise their professional judgement and, if in any doubt, they should seek advice from other external agencies including the LADO.

The DSL/DDSL/ Interim Principal should review the central low-level concerns file periodically to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. A record of these reviews should be made.

**Recording concerns**

All procedures for recording and storing of records should comply with United Learning's Data Protection Policies.

All low-level concerns should be recorded in writing by the DSL/DDSL/Interim Principal. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

The name of the individual sharing the low-level concern, and their role, should be stated, as should the name of the individual about whom the concern is being raised, and their role within the organisation at the time the concern is raised. If the latter individual has an opposing factual view of the incident, this should be fairly recorded alongside the concern. The record should include brief context in which the low-level concern arose, and concise details (which are chronological and as precise and accurate as possible) of any such concern and relevant incident(s). The record should be signed, timed and dated.

There should be appropriate records of:

- all internal conversations – including with the person who initially shared the low-level concern (where this has been possible), the adult about whom the concern has been shared (subject to the above), and any relevant witnesses;
- all external conversations – for example, with the LADO/other external agencies;
- the rationale for decisions;
- any 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 will 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, in which case it should be referred to the LADO. Consideration will also be given to whether there are wider cultural issues within the 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.

Adults about whom a low-level concern has been raised may have rights of access to such records, provided of course that this would not also unreasonably disclose information of children concerned.

The school should retain the record consistent with comply with United Learning's Data Protection policies. The school should retain all records of low-level concerns (including those which are subsequently deemed by the DSL/DDSL/Interim Principal to relate to behaviour which is entirely consistent with the Code of Conduct) in a central low-level concerns file (either electronic or hard copy). Where multiple low-level concerns have been shared regarding the same individual these should be kept in chronological order as a running record. These records should be kept confidential and held securely, with access afforded only to a limited number of individuals such as the DSL/DDSL/Interim Principal and the individual they report to (e.g. Regional Director); and senior HR officer, and the individual they report to (e.g. Head of HR). The DSL/DDSL/Interim Principal may store the central low level concerns file with his/her other safeguarding and child protection records.

Some low-level concerns may also involve issues of misconduct or poor performance, or they may trigger the disciplinary, grievance or whistleblowing procedures. Where these issues would ordinarily require records to be made and retained on the staff member's personnel file, this should be done in the normal way, in addition to the records of the low-level concern(s) being retained in a central low-level concerns file.

If a low-level concern in and of itself is deemed to be serious enough to consider a referral to the LADO and, perhaps following consultation, a referral is made to them, then records relating to the low-level concern should be placed and retained on the staff member's personnel file.

If a low-level concern (or group of concerns) is reclassified as an allegation, all previous records of low-level concerns relating to the same individual should be moved from the central low-level concerns file to the staff member's personnel file and retained in accordance with Part 4 of KCSIE.

When a staff member leaves and/or takes up new employment, that creates a natural point at which the content of the file may be reviewed to ensure it still has value (either as a safeguarding measure or because of its possible relevance to future claims) and is therefore necessary to keep.

Low-level concerns should not be referred to in references unless they relate to issues which would ordinarily be included in a reference, for example, misconduct or consistent poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. Where a low-level concern (or group of concerns) has met the threshold for referral to LADO and found to be substantiated, it should be referred to in a reference. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious should also not be included in any reference.

The school will refer to Part Four, Section Two of KCSIE for further advice and guidance.

**STAFF BEHAVIOUR POLICY / CODE OF CONDUCT**

The school's staff student relationship letter is emailed from United Learning via the Headteacher annually. The aim of the staff student relationship letter is to provide clear guidance about behaviour and actions and responses to low level concerns in order not to place students or staff at risk of harm or of allegations of harm to a student.

**SAFER RECRUITMENT**

The school is committed to safer recruitment processes and ongoing safer working practices. Members of the teaching and non-teaching staff at the school including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role.

For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. Under no circumstances will an individual commence work unsupervised in sole charge of, or in unaccompanied contact with, children without a cleared DBS check. In this case, the individual will have a separate Barred List check and the school will undertake a written Risk Assessment exercise in relation to the proposed work. All other safeguarding checks will be completed and the individual will be appropriately supervised. Please refer to Section C and Appendix 5 of the 'Safeguarding Children – HR Procedural Guidance' available on the United Learning Hub for further guidance.

Full details of the school's safer recruitment procedures for checking the suitability of staff, members of the School LGB and Trustees of ULT and volunteers to work with children and young people is set out in:

• United Learning / the School's Recruitment and Selection Policy;

• United Learning's Safeguarding Children – HR Procedural Guidance;

• United Learning's LGB Handbook; and

• United Learning's guidance: Trustees - Recruitment, Appointment, and Removal Process

These documents are available on the United Learning Hub.

The school's protocols for ensuring that any visiting speakers, whether invited by staff or students themselves, are suitable and appropriately supervised is school's Recruitment and Selection Policy

**MANAGEMENT OF SAFEGUARDING**

The School's DSL is Kirsty Johnson who is a member of the leadership team.

Sharon Hammond is the DDSL and the person to whom reports should be made in the absence of the DSL. This ensures there is always the required cover for the role.}

The DSL and DDSL's contact details can be found on the Key Contacts page at the start of this policy.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the school. The DSL's responsibility is to maintain an overview of safeguarding within the school (including online safety and understanding the filtering and monitoring systems and processes in place), to open channels of communication with local statutory agencies, to liaise closely with safeguarding partners (such as children's social care and the police), support staff in carrying out their safeguarding duties children's social care and the police), support staff in carrying out their safeguarding duties and to monitor the effectiveness of the school's policies and procedures in practice. The DSL (and DDSL) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on a response to a safeguarding concern.

The DSL works with the Safeguarding Governor to review and update the school's safeguarding policy. Where a student leaves the School, the DSL will also ensure their child protection file is transferred to the new school (separately from the main student file) as soon as possible. The DSL will ensure secure transit and obtain confirmation of receipt. The DSL will also consider if it would be appropriate to share any information with the new school in advance of a child leaving. For example, information that would allow the new school to continue supporting victims of abuse, who have a social worker, or who are receiving support through the Channel programme, and have that support in place for when the child arrives. The school will ensure that key staff, such as the SENCO, are also aware of these arrangements, as required.

The DSL should be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

The DSL will inform the safeguarding partners of any incident which they think should be considered for a child safeguarding practice review.

The DSL regularly reviews the school's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in their absence, to a member of the senior management team or directly to local children's services.

The DSL or Deputy DSL will always be available to discuss safeguarding concerns. During term time, the DSL and/ or DDSL will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. For out of hours/out of term activities, the school's arrangements During term time, the DSL and DDSL will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. For out of hours/out of term activities, the school's arrangements are the DDSL can be contacted. Out of term time rota between the DSL, DDSL and SLT are organised prior to any half term and all calls automatically directed to either the DSL or DDSL.

Full details of the DSL's role can be found at Annex C of *KCSIE*.

Ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

**TRAINING**

Induction and training (including online safety, which amongst other things includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) are in line with advice from local safeguarding partners.

**All Staff**

All new staff* will be provided with induction training that includes:

- Safeguarding and child protection, including online safety
- the child protection policy, including information about the identity and role of the DSL(s) and DDSL
- the behaviour policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying)
- the safeguarding response to children who go missing from education
- the staff code of conduct including the school's whistleblowing procedure and the acceptable use of technologies policy, staff/student relationships and communications including the use of social media
- a copy of Part 1 of *KCSIE* (Current edition/publication)
- School leaders and staff who work directly with children will also be required to read Annex B of *KCSIE*.

Copies of the above documents are provided to all 'staff' during induction. On appointment and as part of United Learning Annual Declaration, all staff will receive and sign the up-to-date versions of the Staff Student Relationship Letter and Acceptable Use Declaration.

Temporary staff and volunteers are provided with a safeguarding presentation to outline the school's safeguarding procedures and who the safeguarding team.

As part of the whole school safeguarding approach, all staff are also required to:

- Read Part One of *KCSIE* and confirm that they have done so. Emailed copy of KCSIE Part 1 and completed Microsoft Form to confirm document has been read and understood. Each time Part One of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via email communication.
- Understand key information contained in Part One of *KCSIE*. The school will ensure staff understanding by completing additional online training where required.
- Receive training in safeguarding and child protection regularly, in line with advice from the local safeguarding partners. Training will include online safety and harmful sexual behaviours including sexual violence and sexual harassment between children. It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help. All staff will also be made aware of the local early help process and understand their role in it.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. The school provides these via, for example, emails, whole school meetings and staff briefings.

**DSL(s) - Designated Safeguarding Lead (s)**

The DSL receives updated child protection training at least every two years to provide them with the knowledge, skills and authority required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, supporting SEND children particularly when online, overseeing online safety in school, record keeping and promoting a culture of listening to children, training in the LCSB (until such time as they are replaced with local safeguarding partners) OR local safeguarding partners approach to Prevent duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex C of KCSIE.

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role.

The DDSL is trained to the same level as the DSL.

*Whilst external catering and maintenance staff are not technically United Learning/school employees (and therefore safeguarding training is not the responsibility of the school), they should receive an appropriate safeguarding induction to ensure they are aware of and understand all the school's relevant safeguarding policies (e.g. safeguarding policy/whistleblowing policy).

**Governors and Trustees**

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

All governors (and proprietors) should be aware of their obligations under the Human Rights Act 1998 and, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.

## OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

Christie Spurling is the board-level lead designated to take a lead in relation to responsibility for the Trust's safeguarding arrangements. Bally Sandhu is the LGB lead designated to take a lead in relation to responsibility for the safeguarding arrangements in the school. They are a member of the School's LGB.

A review of the school's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation. The Trust safeguarding review and LGB safeguarding visit encompasses a review of the policy effectiveness. The school draws on the expertise of the trust and school staff, including the DSL(s), in shaping the school's safeguarding arrangements and policies. The school draws on the expertise of staff, including the DSL(s), in shaping the school's safeguarding arrangements and policies.

If there has been a substantiated allegation against a member of staff, the school will work with the Local Authority designated officer to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future.

## THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES

**Teaching children how to keep safe**

The United Learning Trust ensures that all students are taught about safeguarding, including online, through the curriculum, Relationships and Sex Education and Health Education and PSHE to help children to adjust their behaviours to reduce risks and build resilience, including to radicalisation. This includes teaching students about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. It will also include teaching students, for example, about healthy relationships, consent and that sexual violence and sexual harassment is always wrong.

The school recognises the additional risks that children with SEND face online and works with the IT department to ensure that additional support and measures are in place to support these children. Online safety is an integral part of the school's Computing curriculum for all pupils and is taught in an age-appropriate way relevant to pupils' lives. It is essential that children are safeguarded from potentially harmful and inappropriate online material. A whole school approach is taken to online safety in the Online/E-Safety Policy that empowers the school to

protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

It is also embedded in PSHE and Relationships and Sex. Pupils will be taught what positive, healthy and respectful online relationships look like; the effects of their online actions on others; how to recognise and display respectful behaviour online; how to use technology safely, responsibly, and securely; and where to go for help and support when they have concerns. The school has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online, which must be regularly reviewed for their effectiveness. The school's system is Smoothwall. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate, and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help manage online behaviour that can increase a child's likelihood of, or causes, harm.

The school has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online, which must be regularly reviewed for their effectiveness. The school's system is 'Senso'. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help manage online behaviour that can increase a child's likelihood of, or causes, harm.

The leadership team and relevant staff must have an awareness and understanding of the filtering and monitoring provisions in place and manage them effectively. If staff identify a concern, then they should log their concern on CPOMS immediately and use the Online Safety or safeguarding tab to alert the correct staff.

The school will communicate with parents and carers to reinforce the importance of children being safe online and to help them understand what systems schools and colleges use to filter and monitor online use. It will be especially important for the school to make parents and carers aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school (if anyone) their child is going to be interacting with online.

Further detail of the school's approach to online safety can be found in school's Online E-Safety Policy which also includes detail on the use of mobile technology in school (and accessing 3G 4G and 5 technology on school premises) and the School's IT arrangements to ensure that children are safe from terrorist and extremist material when accessing the internet through the school's systems.

https://www.campionschool.org.uk/Portals/0/adam/Files/vHTzHY1GokOjEQZf09AOVw/Files/E-Safety/3_1799_online-safety-policy-march-2024.pdf

**Looked after children (and previously looked after children)**

Looked after children (and previously looked after children) are a particularly vulnerable group.

The school will ensure that prompt action is taken when necessary to safeguard these children and the school ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after (and previously looked after) by a local authority.

Kirsty Johnson is the designated member of teaching staff who has responsibility for their welfare and progress and to ensure that the needs identified in personal education plans are met. The school ensures that the designated member of staff receives appropriate training to carry out their role and has the information they need in relation to any child's looked after status, their care arrangements (including contact arrangements with birth parents and those with parental responsibility) and details of the child's social worker and virtual school head.

The designated member of staff will also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care and will work closely with virtual school heads to promote their educational achievement. The DSL will ensure they have details of the local authority Personal Advisor appointed to guide and support any care leavers and will liaise with them as necessary regarding any issues of concern affecting them.

**Children potentially at greater risk of harm (Children who need a social worker - Child in Need and Child Protection Plans)**

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Where the local authority has made the school aware a child has a social worker, the designated safeguarding lead will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

This information will inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

**Use of 'reasonable force'**

There are circumstances when it is appropriate for staff to use reasonable force to safeguard children.
The school recognises the additional vulnerability when using reasonable force in response to risks presented by incidents involving children with SEND, mental health or with medical conditions. The school will consider its duties under the Equality Act 2010 and their Public Sector Equality Duty. Positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children and agreeing them with parents and carers can reduce the occurrence of challenging behaviour and the need to use reasonable force.

**Arrangements for Visiting Speakers**

The school has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The school's responsibility to students is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.

The school is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the school. This will take into account any vetting requirements considered appropriate in the circumstances and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the school may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on the school site, will be supervised by a school employee. On attending the School, Visiting Speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence. The school shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.}

**Use of school premises for non-school activities**

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

When services or activities are provided by the governing body or proprietor, under the direct supervision or management of their school or college staff, their arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. The governing body or proprietor will therefore seek assurance that the body 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 to liaise with the school on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll. The governing body or proprietor will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; 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.

**Alternative provision**

Where the school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and will ensure it is satisfied that the placement meets the pupil's needs.

The School will obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that schools would otherwise perform on their own staff). This includes written confirmation that the alternative provider will inform the school of any arrangements that may put the child at risk (i.e. staff changes), so that the school can ensure itself that appropriate safeguarding checks have been carried out on new staff.

The school will know where a child is based during school hours and will have records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. They will regularly review the alternative provision placements they make. Reviews will be at least half termly to provide assurance that the child is regularly attending and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the placement will be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

**Use of mobile phones and cameras (and other relevant devices)**

The school's policy on the use of mobile phones and cameras (and other relevant devices) in the setting can be found both in the School's Acceptable Use Policy and the Behaviour Policy.

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**APPENDIX 1 –FURTHER INFORMATION**

All staff should be aware of indicators of abuse and neglect, as well as specific safeguarding issues such as child criminal exploitation and child sexual exploitation. Staff should always be vigilant, and if unsure, should **always** speak to the DSL or DDSL.

All school staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. They can occur from within or outside families, in or out of school, from other children within peer groups or the wider community and/or online. In most cases, multiple issues will overlap with one another and children can therefore be vulnerable to multiple threats.

All staff should be aware that behaviours linked to drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk.

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

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as

overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. Staff are referred to DfE guidance Sexual Violence and Sexual Harassment for further information.

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

**Neglect**: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Specific safeguarding issues:** behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger. Safeguarding issues can also manifest themselves via child-on-child abuse, such as bullying (including cyberbullying), gender-based violence/sexual assaults and sexting. Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; domestic abuse; fabricated or induced illness; faith abuse; female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; and trafficking.

**Child Criminal Exploitation (CCE) and Child Sexual Exploitations** are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power
imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. CSE and CCE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may

not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

More information can be found at:

Multi-agency practice principles for responding to child exploitation and extra-familial harm

Non-statutory guidance for local areas, developed by the Tackling Child Exploitation (TCE) Support Programme, funded by the Department for Education and supported by the Home Office, the Department for Health and Social Care and the Ministry of Justice

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

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

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

**Child Sexual Exploitation (CSE):** CSE is a form of sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact: it can also occur through the use of technology.

CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex; can still be abuse even if the sexual activity appears consensual; can include both contact (penetrative e.g. rape and oral sex and non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing) and non-contact sexual activity (such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. It can take place in person or via technology, or a combination of both; can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence; may occur without the child or young person's immediate

knowledge (e.g. through others copying videos or images they have created and posted on social media); can be perpetrated by individuals or groups, males or females, and children or adults.

The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse; and is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or do not take part in education.

CSE is a geographically widespread form of harm that is a typical **feature of county lines** criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of drugs trafficking. The DSL or DDSL will consider a referral to the National Referral Mechanism as soon as possible if there are county line concerns, such as a child being a potential victim of modern slavery or human trafficking.

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with **serious violent crime**. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

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

If staff have a concern about a child or a child makes a report to a member of staff, staff should follow the referral process in this policy. If staff are in any doubt about what to do, they should speak to the DSL or DDSL.

**County lines**

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

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

The Home Office have provided further information in the document below:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863323/HOCountyLinesGuidance_-_Sept2018.pdf

**So called 'Honour Based' Abuse** encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM)], forced marriage, and practices such as breast ironing. It can include multiple perpetrators.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the multi-agency statutory guidance on FGM.

If staff have a concern that a student may be at risk of HBA or has suffered HBA, they should speak to the DSL (or DDSL). As appropriate they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children's Social Care.

There is a statutory duty on teachers to personally report to the Police where they **discover** (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a student is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either

through disclosure by the victim or visual evidence) or it involves a student over 18, teachers should follow the school's local safeguarding procedures.

**Forced Marriage:** Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at: **https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage .** School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

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

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

1. negate or destroy the fundamental rights and freedoms of others; or
2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

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

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

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

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

The school's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

**Special Educational Needs and/or Disabilities or physical health issues**: Students with SEND or certain health conditions can face additional safeguarding challenges. They may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect. Students with SEND are more likely to be abused by other children. The barriers to recognising abuse and neglect of this group of children can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability or health condition without further exploration;
- being more prone to peer group isolation than other children
- the potential for children with SEN and disabilities being disproportionally impacted by behaviours such as bullying, including prejudice-based bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges.

To address these additional challenges, the school has put in place the following pastoral support measures as outlined in our Behaviour Policy.

Further guidance can be found in the DfE guidance Supporting pupils at school with medical conditions, and where applicable in the SEND Code of Practice.

Staff will support such students in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate. Any reports of abuse involving children with SEND will entail close liaison with the DSL or DDSL and named person with oversight for SEN.

**Lesbian, Gay, Bisexual or gender questioning:** This is not in itself an inherent risk factor for harm. However, children can be targeted by other children. In some cases, a child who is perceived by other children to be Lesbian, Gay, Bisexual or gender questioning (whether they are or not) can be just as vulnerable as children who identify as Lesbian, Gay, Bisexual or gender questioning .

Risks can be compounded where children who are Lesbian, Gay, Bisexual or gender questioning lack a trusted adult with whom they can be open. The school 'creates a culture' where young people can speak out or share their concerns with members of staff, including the RSE and health curriculum the LGBTQ+ Club, through the antibullying ambassadors and being able to speak to a trusted adult when needed.

**Children and the court system:** Children are sometime required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed, and this will be stressful for them. Making child arrangements following separation can also be stressful and entrench conflict in families. Staff should be alert to the needs of such students and report any concerns to the DSL or DDSL in accordance with this policy. There are two age appropriate guides to support children 5-11 year olds and 12-17 year olds, links can be found in Annex B of KCSiE.

**Children who go missing from education/children absent from education or school:** A child going missing is a potential indicator of a range of safeguarding possibilities, such as abuse or neglect. The school asks parents to provide more than one emergency contact number for each student so additional options are available to contact a responsible adult when a child goes missing is also identified as a welfare and/or safety concern.

Staff must follow the school's procedures for dealing with children who go missing, particularly on repeat occasions. The school's procedure for dealing with children who go missing can be found in the school's Attendance Policy. All unexplained or unauthorised absences will be followed up in accordance with this policy.

The school shall inform the local authority of any student who is going to be added to or deleted from the school's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This will assist the local authority to:

a) fulfil its duty to identify children of compulsory school age who are missing from education; and
b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation.

School attendance registers are carefully monitored to identify any trends. The school will inform the local authority and the local authority where the child is normally resident of any student who fails to attend school regularly or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority.

Action should be taken in accordance with this policy if any absence of a student from the school gives rise to a concern about their welfare.

**Children with family members in prison:** Children who have a parent in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. Staff should be alert to the needs of such students and report any concerns to the DSL or DDSL in accordance with this policy.

**Child abduction and community safety incidents:** Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at:
www.actionagainstabduction.org
and www.clevernevergoes.org.

Children in need: defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health or development is likely to be significantly or further impaired, without the provision of services; or a child with a disability. Local authorities are required to provide services to safeguard or promote the welfare of children in need, and they may be assessed under s17 Children Act 1989.

**Domestic abuse:** Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

**Homelessness:** Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. The DSL or DDSL will raise/progress any concerns about homelessness with the Local Housing Authority although this does not replace a referral into children's social care where a child has been harmed or is at risk of harm.

**Child-on-child abuse**

Children can abuse other children. This is generally referred to as child-on-child abuse and can take many forms. This can include (but is not limited to):

- abuse within intimate partner relationships between children/peers;
- bullying (including cyberbullying) prejudice-based and discriminatory bullying;
- sexual violence such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);

- consensual and non-consensual sharing nudes and semi-nudes images and videos (also known as sexting or youth produced sexual imagery);
- upskirting (see below);
- initiation/hazing type violence and rituals (this could include abuse or humiliation used as a way of initiating a person into a group or event including online).

It can happen both inside and outside school and online. It is important that all staff recognise the indicators and signs of child-on-child abuse, how to identify it and respond to reports. **Even if there are no reports in the school, this does not mean that it is not happening. Any concerns regarding child-on-child abuse must be referred to the DSL or DDSL.**

**Sexual violence and sexual harassment between children in schools and colleges**

**Context**

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable.

It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk.

Staff should be aware of the importance of:

- challenging inappropriate behaviours;
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;

• not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and

• challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

**What is sexual violence and sexual harassment?**

**Sexual violence**
It is important that school staff are aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below:

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

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

**Sexual Assault**: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

**Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could be forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
**What is consent**? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

a child under the age of 13 can never consent to any sexual activity;

• the age of consent is 16;

• sexual intercourse without consent is rape.

**Sexual harassment**

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.
Whilst not intended to be an exhaustive list, sexual harassment can include:
• sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;

• sexual "jokes" or taunting;

• physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools should be considering when any of this crosses a line into sexual

violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and

• online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

- o non-consensual sharing of nudes and semi-nudes images and videos;
- o sexualised online bullying;
- o unwanted sexual comments and messages, including, on social media;
- o sexual exploitation; coercion and threats; and
- o upskirting.

**Upskirting**

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

**The response to a report of sexual violence or sexual harassment**

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process. As is always the case, if staff are in any doubt as to what to do, they should speak to the designated safeguarding lead (or a deputy).

**Mental Health:** All staff should also be aware that 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. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

Reference should be made to:

Mental Health and Behaviour in schools DfE guidance (November 2018);

DfE guidance 'promoting and supporting mental health and wellbeing in schools, which details numerous resources available to schools; and

Public Health England: Promoting children and young people's emotional health and wellbeing a whole school and college approach

Paragraphs 183-189 of 'Keeping Children Safe in Education'

Campion School takes the mental health of students seriously and has developed clear systems for early identification and robust referral systems. All staff receive training to be vigilant in noticing changes in behaviour of students, to identify students with emerging mental health issues (whilst recognising we cannot diagnose) and log these concerns on CPOMS. From there the DSL team triage and allocate a key worker to support. This support will initially start with the child, extend to contacting parents, sharing contacts for the Lowdown and encouraging GP/School nurse referral. Internal counselling may be offered through our on-site school counsellor. The School has non-teaching Heads of Year who are available throughout the day. The Bridge is also a facility whereby students can drop in at break and lunchtime.

**Modern Slavery and the National Referral Mechanism**

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

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)

**Cybercrime**

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

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

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that **Cyber Choices** does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK

**A Whole School Culture of Safeguarding**

Some pupils or students may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination. Such concerns will differ between education settings, but it is important schools and colleges are conscious of disproportionate vulnerabilities and integrate this into their safeguarding policies and procedures.

**APPENDIX 2 – Meet the Safeguarding Team (Template)**

**The Designated Safeguarding Lead is:**

INSERT NAME AND ADD PHOTO BELOW



INSERT NAME is located at:
INSERT LOCATION

**The Deputy Designated Safeguarding Leads are:**

INSERT NAME AND ADD PHOTO BELOW



INSERT NAME is located at:
INSERT LOCATION

INSERT NAME AND ADD PHOTO BELOW



INSERT NAME is located at:
INSERT LOCATION

**Other people in the Safeguarding Team are:**

INSERT NAME AND ADD PHOTO BELOW



INSERT NAME is located at:
INSERT LOCATION
and responsible for: INSERT TEXT

INSERT NAME AND ADD PHOTO BELOW



INSERT NAME is located at:
INSERT LOCATION
and responsible for: INSERT TEXT

INSERT NAME AND ADD PHOTO BELOW



INSERT NAME is located at:
INSERT LOCATION
and responsible for: INSERT TEXT

INSERT NAME AND ADD PHOTO BELOW



INSERT NAME is located at:
INSERT LOCATION
and responsible for: INSERT TEXT

INSERT NAME AND ADD PHOTO BELOW



INSERT NAME is located at:
INSERT LOCATION
and responsible for: INSERT TEXT

INSERT NAME AND ADD PHOTO BELOW



INSERT NAME is located at:
INSERT LOCATION
and responsible for: INSERT TEXT

**APPENDIX 3 – Safeguarding Training Log (Template)**

| **Safeguarding Training Log – Academic Year [●INSERT]** | | |
|---|---|---|
| **Attendees** | **Type of training provided** | **Date undertaken** |
| Principal/Head | | |
| DSL | | |
| DDSL | | |
| Senior Leadership Team | | |
| Pastoral Leads | | |
| Whole School | | |
| e-safety Lead | | |
| P.E. staff | | |
| Medical Needs Officer | | |
| Paediatric First Aiders | | |
| Health & Safety /COSH | | |
| EVC | | |
| Chair of Governors of LGB | | |
| Nominated Safeguarding Governor of LGB | | |
| Local Governing Body (whole board) | | |
| Agency Staff /Peripatetic | | |
| Volunteers | | |
| Contractors | | |
| Other | | |

**APPENDIX 4 – STAFF/STUDENT RELATIONSHIP LETTER AND GUIDANCE NOTES**

Guidance on staff student relationships – general principles

1 The relationship between staff and students is a professional one. Whilst it is expected that staff in school have a friendly and caring relationship with students, the relationship remains professional, not personal.

2 A personal relationship may occasionally arise due to family circumstances: for example if your own children are friends with those in the school or if you have a personal relationship with parents of children in the school. This can be appropriate as long as school leaders are aware. Otherwise a personal relationship between any staff member and student is inappropriate.

3 It is not appropriate for a student to visit a member of staff in their own home, or for a member of staff to meet with a student out of school hours or off school premises, without the express knowledge and consent of school leaders and the student's parent or guardian.

4 Over-familiar words and actions, displays of affection, singling children out with gifts or special attention, and discussion of one's private life or the personal life of the student are almost always inappropriate. Sexual innuendo is wrong in all circumstances.

5 Members of staff who need to work on a one-to-one basis with students in the course of their professional duties should either use a room which has vision panels in the door or keep the door open and ensure that colleagues know the meeting or lesson is taking place.

6 Staff should avoid driving students in their own cars where possible and ensure that they are not alone with just one student. Written parental consent should be obtained and a central dropping-off point arranged rather than home drops.

7 Physical contact with students must be avoided. This may be justifiable in limited circumstances: for example to pick up a young child who has fallen over in the playground, to break up a fight, or to restrain a student who risks causing injury to themself or others. In the latter scenarios 'reasonable force' may be used, which means 'no more force than is needed'. Current DfE guidance is contained in 'Using Reasonable Force: Advice for head teachers, staff and governing bodies'. Members of staff must familiarise themselves with the school's physical restraint or behaviour policy and seek any clarification needed.

8 Occasionally it is necessary for professional academic reasons for staff to communicate with students out of school. A school mobile phone should be used where possible. Personal email addresses, phone numbers, social media contact details, online aliases or text-based messaging aliases must not be given, requested or used. Records of all contact must be kept on the student file, including the reason why personal contact was necessary.

9 It is not appropriate for boarders to have access to staff residential accommodation except in exceptional circumstances, with more than one adult present, and with the agreement of a school leader.

10 Any gathering organised as part of a celebration should usually be held on school premises. Staff should not consume alcohol whilst in the company of children.

11 Social networking sites such as Facebook, X, Instagram, WhatsApp, TikTok, SnapChat, LinkedIn, YouTube, gaming platforms and other digital media pose risks for staff in relation to professional integrity and student welfare.

(a) Staff must not use these sites to contact or communicate with current students, former students under the age of 18 or those who have recently left the school.

(b) Staff must take care when posting or commenting on posts to avoid putting themselves at risk of any accusations or of bringing their school into disrepute.

(c) If you become aware of inappropriate material online about yourself, the school, a student, a colleague or the Group, you must inform a senior leader and they will instruct a member of staff to check the allegations and inform the appropriate authorities.

(d) Staff should not follow students on social media and should take steps to prevent students from following them.

(e) Staff must comply with the school image use policy, such as not including pupil surnames with pictures and ensuring parental permission has been given before posting a child's image.

12 If anything occurs which concerns you or makes you feel uncomfortable, you must discuss this with a senior colleague as soon as possible, even if it turns out that nothing untoward has happened. You must make a written record, dated and signed, of any such incident. Guidance regarding low level concerns in your school's safeguarding policy should be followed.

13 If an allegation is made against a member of staff, contractor or volunteer, the Group is committed to dealing with the allegation fairly, quickly and consistently, in a way that provides effective protection for the child and supports the person who is the subject of the allegation.

14 Staff should familiarise themselves with information relevant to staff-student relationships in their school policies and procedures, such as:

(a) Safeguarding Policy and Child Protection Policy and Procedures;

(b) Behaviour and Discipline;

(c) Physical Restraint;

(d) Email and Internet Acceptable Use Policy;

(e) Social Media Policy.