Thornton Primary School Safeguarding & Child Protection Policy, Procedures and Toolkit 2026-27

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This Policy is available on the school website. A copy can be obtained from the school office on request.

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Key contacts and information

Useful Contacts	
Name / Role / Service	**Contact Information**
In Our School	
Chair of Governors	Emma Cummins
Nominated Safeguarding Governor	Theresa Berry
Designated Safeguarding Lead (DSL)	Farah Ayub
Deputy DSLS (Specifically name DSL for EYFS)	EYFS – Atia Karamat Elizabeth Davison Victoria Wood Juwaria Mohammed Hannah Rhodes Charlotte Bradley Saliha Rubani – Resourced Provision
Prevent Lead (Single Point of Contact / SPOC)	Farah Ayub
Designated LAC Teacher	Charlotte Bradley
SENDCO	Charlotte Bradley
Mental Health Lead	Charlotte Bradley
Attendance Lead	Farah Ayub
DSL covering before / after school provision	Farah Ayub
Operation Encompass Key Adult	Farah Ayub
OTHER	
Focus-Trust	
Andrew Chadwick (Safeguarding, Ambition and Inclusion Lead)	Internal through Teams / phone. External through info@focus-trust.co.uk
Michael Rowland (CEO)	Internal through Teams / phone. External through info@focus-trust.co.uk
Human Resources / Working with Schools	0161 707 1520
OTHER	
Local Authority / Multi-Agency	
Schools Safeguarding Advice	01274 433999
Family Help / Early Help / Assessment	Angela Porret 07582102347
Local Authority Children's Social Care Advice	01274 433999
Local Authority Children's Social Care Referrals	01274 433999
Police Public / Family Protection Unit	01274 376999
LADO	01274 435600
Channel Programme / Prevent	Danielle King, Prevent Coordinator. Telephone: 07788 264621 Email: Danielle.king@bradford.gov.uk Assia Hussain, Prevent Schools Engagement Officer Telephone: 07816 351420
Children Missing Education	01274 438877
Elective Home Education	01274 439340
Virtual School Head	Jonathan Cooper jonathan.cooper@bradford.gov.uk
Young Carers	Young Carers Service 01274 449660

Private Fostering	Children and Families Trust 01274 433999
Housing and Homelessness	01274 435999
Other	
PCSO linked to School	Emily Mc Cormick 0792182451
Child Sexual Exploitation	01274 435600 Children's Social Care Contact Point
CAMHS	01274 723241

Policy Statement

Safeguarding permeates all aspects of life at our school**.** We recognise that we are an important part of the wider safeguarding system for children, that everyone in school is responsible for safeguarding and has a valuable contribution to make. We aim to provide a positive, stimulating, caring and safe environment which promotes the social, physical, emotional and moral development of each child. We will strive to ensure that all pupils remain safe and free from harm and are committed to playing a full and active part in multi-agency safeguarding processes and responses.

This policy gives clear direction to staff, volunteers, governors, visitors and parents about our school and Focus-Trust's safeguarding responsibilities and procedures. It also lays-out our expectations and makes clear the ways in which everyone will safeguard and promote the welfare of pupils. This policy and related procedures will be central to staff training and induction.

The school and Trust's policies and procedures apply at all times where services or activities are provided under the direct management of school staff. These are reviewed as and when required and at least annually. Should any deficiencies or weaknesses in safeguarding and child protection arrangements become apparent they will be remedied without delay.

Our culture is underpinned with the knowledge that "It could happen here".

Definitions

Child - someone who is yet to reach their 18th birthday. (Our commitment to safeguarding and promoting welfare extends to all children, young people and adults who may be vulnerable).
Child Protection - activity undertaken to protect under 18s who are suffering or likely to suffer significant harm.
Safeguarding and Promoting Welfare – Keeping Children Safe in Education defines safeguarding 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

Unborn children - Safeguarding responsibilities also extend to unborn children where there are

concerns about risk, in line with Working Together to Safeguard Children 2026.
Family Help – Family Help is the coordinated multi-agency response described within Working Together to Safeguard Children 2026. It combines targeted early help and statutory child in need support and aims to provide the right help at the right time before risks escalate.

Other specific definitions are laid out in the relevant sections and appendices of this policy.

Legislative framework and guidance

This Policy is consistent with relevant legislation, regulations, statutory and non-statutory guidance, for example (this list is certainly not exhaustive):

- Human Rights Act 1998;
- Equality Act 2010;
- Children Acts 1989 and 2004;
- Children and Social Work Act 2017;
- Child Care Act 2006;
- Education (Independent Schools Standards) (England) Regulations 2003;
- Working Together to Safeguard Children (Department for Education, March 2026);
- Keeping Children Safe in Education (Department for Education, September 2026);
- Framework for the Early Years Foundation Stage;
- Working Together to Improve School Attendance.
- Data (Use and Access) Act 2025
- Children's Wellbeing and Schools Act 2026
- Crime and Policing Act 2026
- Information Sharing Duty Statutory Guidance for Safeguarding Organisations and their Practitioners (UK Government, September 2026)
- Section 16LA of the Children Act 2004 (Information Sharing Duty) introduced by the Children's Wellbeing and Schools Act.

Effective safeguarding demands that all children should be protected from all forms of abuse, violence and harassment. It also relates to a broad range of other issues, policies and procedures. Safeguarding is at the very forefront of and underpins all aspects of policy development and practice in our school and across the Focus-Trust. Therefore, this document must be read, understood and applied in line with associated policies and procedures:

- Online Safety Policy
- Behaviour Policy
- Intimate Care Policy
- Attendance Policy
- Code of Conduct
- Safer Recruitment Policy
- Low-level Concerns/Allegations Policy
- Artificial Intelligence Policy

Equality statement

Some children have an increased risk of abuse, and additional barriers can exist in recognising or disclosing it. We are committed to anti-discriminatory practice and to recognising and responding to children's diverse circumstances. We ensure that all children receive the same level of protection, while recognising and addressing the barriers they may face. In line with Working Together to Safeguard Children 2026, we actively challenge racism, discrimination and disproportionality in safeguarding practice. Leaders and practitioners reflect on bias, ensure culturally informed responses, and work to remove barriers that may prevent children and families from accessing help, protection and support.

We give special consideration to children who:

- Have special educational needs or disabilities (SEND)
- Are living in challenging circumstances, such as temporary accommodation or family environments affected by substance misuse, mental health issues, or domestic abuse
- Are young carers
- May experience discrimination due to race, ethnicity, disability, religion, gender identity
- Have English as an additional language (EAL)
- Are at risk of female genital mutilation (FGM), child sexual exploitation (CSE), forced marriage, or radicalisation
- Are asylum seekers or refugees
- Are in care, previously looked after, or living in alternative care arrangements (including private fostering and kinship care)

The school recognises that racism and faith-targeted abuse can significantly affect a child's welfare, wellbeing, mental health and sense of safety. Such incidents will be taken seriously and responded to promptly through safeguarding, behaviour and equality procedures as appropriate.

Roles and responsibilities

Safeguarding is everyone's responsibility and our whole-school approach reflects this. Some staff members have additional or specific responsibilities for safeguarding:

Safeguarding governance

The Focus-Trust Board is responsible for ensuring that all schools have a robust culture of safeguarding and that all policies, systems and practice is compliant with legal and statutory duties. The Trust Board delegates some of its safeguarding responsibilities to its committees, including the school's Local Governing Body. This is detailed in the Trust's Scheme of Delegation.

While the Designated Safeguarding Lead takes ultimate responsibility for this, trustees and governors recognise their responsibility to ensure that the appropriate filtering systems and mechanisms are in place and monitor their effectiveness in line with the relevant standards.

https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges

Trustees and governors will be provided with accurate information and will discuss any emergent issues with pupils, the DSL and IT staff.

Those responsible for governance hold senior leaders to account, are well trained (in accordance with KCSIE), visible and proactive in undertaking this. Trustees and governors also recognise the expertise staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis. Therefore, it works with the Headteacher and Designated Safeguarding Lead(s) (DSL) to ensure that staff have opportunities to contribute to and shape safeguarding arrangements in school.

Some governors have additional and specific safeguarding responsibilities (names can be found on the table at the beginning of this policy, "Key Contacts and Information"):

Chair of Governors

The Chair of Governors will liaise with the Focus-Trust's SAIL in the event of an allegation against the Headteacher and, where appropriate, the local authority's designated officer (sometimes called LADO).

Nominated Safeguarding Governor (NSG)

The NSG acts as a conduit between the DSL, the LGB and Focus-Trust on safeguarding matters. The Designated Safeguarding Lead meets with and provides regular updates to the Nominated Safeguarding Governor (NSG) every half-term. The NSG will use the Focus-Trust Planner tool to guide these meetings and to provide an update to the LGB. Discussions and any agreed and / or remedial action(s) are documented and followed-through, formally and without delay. NSGs are also active participants in the Trust's [external] safeguarding reviews and audit returns for safeguarding partners.

Governors will ensure that filtering and monitoring arrangements are formally reviewed at least annually and whenever significant technological or organisational changes occur.

Designated Safeguarding Leads (DSLs)

(names can be found on the table at the beginning of this policy, "Key Contacts and Information")

The role and responsibilities of our DSL and Deputy DSLs are described in KCSIE, Part 2 and Annex B. Briefly - and this list is certainly not exhaustive - this includes:

- Taking **lead** responsibility for safeguarding and child protection (including online safety and understanding filtering and monitoring in place)
- Promoting and embedding a culture of listening to children, taking account of their wishes and feelings, and high aspiration for children who might be especially vulnerable (including online and also in respect of their educational outcomes)
- Managing referrals and leading the school's safeguarding response, including at multi-agency level
- Overseeing and managing safeguarding record keeping and information sharing
- Steering, supporting and advising staff
- Acting as a key safeguarding conduit for the Headteacher and governors.

Governors ensure that DSLs have the status, training, additional time, funding, resources and support they need to discharge their responsibilities.

DDSLs are supported by the DSL, through group and individual supervision at least termly. The DSL is supported by the Headteacher, Focus-Trust SAIL or may decide to seek support from an external supervisor. This may include accessing Kirklees Wellness Service, funded by Focus-Trust.
On a day-to-day basis safeguarding activities may be delegated to a Deputy Designated Safeguarding Lead (DDSL) but final lead responsibility remains with the DSL. This is explicit in their job description.

The Designated Safeguarding Lead will ensure that information from multiple sources is considered collectively to build the fullest possible understanding of a child's circumstances, experiences and level of need.

Training

The DSL / DDSLs are all trained to the same standard, at least every two years. They also attend appropriate refresher training at least annually. The DSL is a senior member of staff.

Knowledge
The DSL / DDSLs all understand their role and responsibilities, can manage referrals and know how to identify, understand and respond to:
- specific needs that increase vulnerability
- the unique risks associated with online safety (and have the relevant knowledge and up to date capability required to keep children safe whilst they are online)
- specific harms that can put children at risk.

Managing referrals
The DSL / DDSLs will refer cases:
- of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme

Vulnerable children
DSLs are also alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers (S.12 Children Act 1989) and recognise the additional risks that looked after, previously looked after and children with special educational needs and disabilities (SEND) face online, e.g. from online bullying, grooming and radicalisation and have the capability to support these children to stay safe online.

The Point of Contact in School and A Source of Advice and Support
We recognise that the Designated Safeguarding Lead (DSL) (and their Deputies (DDSLs)) are most likely to have a complete safeguarding picture in school. Wherever possible, staff will **always** notify [verbally and via CPOMS] and speak to the DSL (or DDSL in their absence) if they have a concern about a child's welfare, however 'minor' this might seem. This will happen as soon as possible and always that same [school] day. During term time, the DSL and/or a DDSL will always be available (during school hours) for staff in the school to discuss any safeguarding concerns with.
DSLs will monitor and review concerns and open cases through CPOMS, ensuring that all incidents are acknowledged, assessed and actioned. These will be reviewed, with all DDSLs through group supervision at least half-termly.

DSL Continuity Arrangements
The school maintains robust safeguarding continuity arrangements whenever the DSL is absent. This includes named deputy DSLs trained to the same standard, clear escalation pathways and systems to ensure concerns are received, monitored and acted upon without delay.

The school may utilise shared safeguarding inboxes, secure electronic systems and agreed leadership cover arrangements to ensure safeguarding responsibilities remain fully operational.

Staff Responsibilities
Recognising Abuse, Neglect and Exploitation
- All staff, including those who do not work directly with children, will read Part One of Keeping Children Safe in Education 2026. The school will ensure staff understand and can discharge the safeguarding responsibilities outlined within it.
- All staff are able to identify and recognise all forms of abuse, neglect and exploitation.
- Staff understand that prejudice-based harm, including racism, faith-targeted abuse, disability-related discrimination, sexism, homophobia, biphobia and transphobia, can have a significant impact on a child's welfare, wellbeing and safety. Such incidents must not be minimised and should be considered through a safeguarding lens where appropriate.

- School staff are well placed to observe any physical, emotional or behavioural signs which indicate that a child may be suffering or is likely to suffer significant harm.
- All staff therefore receive regular training which ensures they are able to identify indicators of abuse, neglect and exploitation.
- Training is updated in order to ensure that all staff can identify and respond to new, specific and emergent risks and threats.
- It is vital that all staff exercise professional curiosity so that they are able to identify cases of children who may be in need of help or protection.
- All staff are 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 DSL / DDSLs 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 abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.
- All staff are aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing and misogynistic /misandrist messages, making, sharing or possessing nudes and semi-nudes, including AI-generated content, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.
- There are myriad potential indicators, physical, emotional and / or behavioural. Some are quite generic and apply to more than one form of abuse while others are more contextually specific. Similarly, potential indicators might vary considerably from person to person, depending on their experience(s), circumstances and capacities.
- Descriptors of types of abuse and exploitation and possible signs are outlined in Appendix 1.
- All staff must familiarise themselves with all types of abuse, including the procedures to follow for specific safeguarding issues. Appendix 1.
- Whatever the form of abuse or neglect, we will always put the needs of children first when determining what action to take.

Children may experience multiple harms simultaneously and safeguarding responses should consider the cumulative impact of adversity, abuse, neglect and exploitation.

All practitioners must exercise professional curiosity and respectfully challenge where explanations do not fully account for a child's lived experience.

Staff will demonstrate a mindset of 'it could happen here' where safeguarding is concerned and identify any safeguarding concerns including potential indicators of all forms of abuse, neglect and exploitation.

Staff Procedures for Reporting Concerns about a Child

- If you have any safeguarding concerns about a child, you must report it immediately to a DSL / DDSL.
- You can find posters displayed around school to identify the DSL / DDSLs if you are not sure.
- Following this, you must make a record on CPOMS as soon as possible.
- CPOMS is a record keeping database and is not a replacement for speaking with the D/DSL

face to face.

- If CPOMS is not available, you must make a record on a paper recording proforma and give this directly to the DSL. These forms are available from a DSL or the school office.
- DSLs will check that the staff member reporting a concern has the support they require.and will check to ensure that any immediate risks and safety issues are / have been addressed.
- DSLs will, where necessary and without investigating, gather any basic, factual information, and take appropriate action by either;
    - managing any support for the child internally via the school's own pastoral support processes
    - undertaking an Early Help or Family Help assessment, or
    - making a referral to statutory services, as the child could be in need, is in need or is suffering, or likely to suffer harm.
- DSLs must update CPOMS with any actions and the rationale for these, including from other agencies.
- DSLs will also provide feedback to staff, on a need-to-know basis.
- If you are dissatisfied with the DSL's response to a safeguarding concern you must:
- challenge the DSL, and/or
- raise your concern with a DDSL and/or the Headteacher of the school, and/or
- raise the issue with Focus-Trust's SAIL or
- contact Children's Social Care or
- contact the Police if the child is at immediate risk of abuse.

Remember, anyone can make a referral to Children's Social Care.

- If a DSL / DDSL is dissatisfied with the response of another agency or professional the DSL will seek further advice, may decide to request reconsideration and/or, where necessary, follow local escalation procedures and challenge. This will be carried out in-line with multi-agency protocols and procedures.
- Clear records of discussions, decisions and rationale will be recorded on CPOMS.
- Additional advice and support should be sought from Focus-Trust's SAIL.

Staff will ALWAYS err on the side of caution, and discuss and share any concerns about a child's welfare with the DSL (or DDSL in their absence) [verbally and via CPOMS] however 'minor' this might

Remember that your initial response is incredibly important!

- ✓ Stay calm & focus on them
- ✓ Check to see if anyone is in danger now
- ✓ Be honest about confidentiality but reassure them that you will only share on a 'need to know' basis
- ✓ Reassure and help them to open up, e.g. the law is there to protect not criminalise them
- ✓ Look interested - keep body language open & respond to theirs
- ✓ Listen at their pace – slow things down and respect pauses / silence

Things to avoid

- ☹ Investigating or interrogating
- ☹ Promising confidentiality or to keep 'secrets'
- ☹ Rushing or interrupting
- ☹ Displaying shock or anger
- ☹ Leading or multiple questions
- ☹ Getting embroiled in why
- ☹ Opinions about what may or may not have happened
- ☹ Telling people to go and tell or

Make a Record as soon as possible

- ☺ Stick to the FACTS as you understand them - who? what? where? when?
- ☺ Use their words and phrases
- ☺ Record what led up to the conversation, where it took place and who was present
- ☺ Make a note of any questions you needed to ask or prompts you used
- ☺ Demeanour and gestures can be really important to record, as can words or phrases that are repeated - try and describe these accurately
- ☺ Differentiate between a fact and an interpretation or opinion
- ☺ Record on CPOMS

If you're unsure what to record make a note of the key facts - as above - and discuss with the Designated Safeguarding Lead or DDSL without delay

Working with others

Family Help and Early Help

Family Help means providing support to children and families as soon as needs emerge. It brings together targeted early help support and statutory child in need services within a coordinated multi-agency response, as described in Working Together to Safeguard Children 2026.

The school recognises that timely support can prevent concerns from escalating and improve outcomes for children and families.

Early help sits within the wider Family Help approach described in Working Together to Safeguard Children 2026, bringing together targeted early help and statutory child in need support into a coordinated, multi-agency response.

All staff are aware of their local Family Help process and understand their role in it.

All staff are alert to the potential need for Family Help, including targeted early help for any child whose circumstances may increase vulnerability or place them at risk of harm. For example:

- Has a disability
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded
- Has exhibited early signs of abusive, violent or harmful behaviour
- Is on a part-time timetable
- Has experienced repeated removals from class
- Is experiencing temporary accommodation or homelessness
- Those under Kinship care or a Special Guardianship Order

Multi-agency working

We work collaboratively with local safeguarding partners and recognise the role of local safeguarding partners in coordinating safeguarding arrangements, learning from reviews, identifying local priorities and supporting the effectiveness of safeguarding practice across the partnership.

DSLs and DDSLs are clear about multi-agency processes and procedures, particularly in respect of Local Authority Children's Social Care, and demonstrate a working knowledge of WTTSC including:

- the assessment process for providing early help and statutory intervention, including local criteria for action and referral arrangements
- how local authorities conduct a child protection case conference and a child protection review conference. Our DSL and DDSLs will attend and contribute effectively. Reports will be provided in advance of such meetings, in-line with and, where applicable, using locally agreed templates and protocols.

The DSL and DDSLs understand local Family Help arrangements, referral pathways and thresholds for intervention.

Working with families

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

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

If we believe that notifying the parents or carers would increase the risk to the child, we will seek advice from the local authority children's social care team and the Focus-Trust's SAIL before doing so.

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

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

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

Where appropriate, the school will support Family Group Decision Making processes coordinated by partner agencies.

Supporting vulnerable pupils

Children with special educational needs (SEN), disabilities and/or medical conditions can face additional safeguarding challenges, not least because additional barriers can exist when it comes to recognising abuse and neglect.

In order to address these additional challenges, we ensure that extra pastoral support is and attention is available for these children. We also ensure that appropriate support for communication is in place. Disabled children might also suffer abuse other than via overt physical or sexual assaults. This means that staff need to think carefully and holistically about the needs of individual children in respect of privacy, dignity and respect, food, mobility, online activity, promoting positive behaviour, medication, finances, supervision, restraint, intimate care and the use of aids and adaptations.

We apply the principles and procedures laid-out in this and related policies to all children and the LGB scrutinises what we do in order to ensure that we remain compliant and effective. We will ensure that:

- We fulfil our duties under the Equality Act 2010 by relation to making reasonable adjustments, non-discrimination and our Public Sector Equality Duty;
- We know our children and their wider circumstances well;
- We work in partnership with parents, carers and other agencies / professionals;
- Key staff are absolutely familiar with relevant guidance protocols, procedures and documentation;
- Staff possess / develop the skills they need to give **all** children a 'voice' and, where necessary, to ensure that we are able to advocate effectively for them;
- Staff develop appropriate skills and knowledge around issues and conditions affecting individual children, accessing further and specialist training where necessary;
- Transitions are well planned and as smooth as possible.

We also plan carefully and in partnership so that we can deliver positive and proactive behaviour support, for instance through individual behaviour plans for more vulnerable children, and agreeing them with parents and carers. We also monitor, review and reflect on any issues or incidents in order to try and reduce the occurrence of behaviour which challenges and the need to use reasonable force.

Working closely alongside the Designated [LAC] teacher and SENDCO, the DSL will ensure that teaching staff are supported so they can identify the challenges that children who have or who have had a social worker might face: even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes. Via its co-ordinated, whole-school approach, the school will provide the additional support and adjustments that best support these children and which help them reach their potential and stay safe.

The school recognises that babies and very young children are particularly vulnerable to abuse and neglect and practitioners should be alert to indicators affecting unborn babies, infants and pre-school children.

We will work to ensure that we give all children a voice.

Children questioning their gender

We recognise that some children may be questioning their gender. The school will respond sensitively and respectfully, ensuring safeguarding, parental involvement, risk assessment, welfare and best interests considerations are central to decision-making.

Children living in temporary accommodation

Children living in temporary accommodation may experience increased vulnerability because of disruption to education, attendance, health services, family support networks and access to community resources.

The school recognises that temporary accommodation may impact on a child's wellbeing, educational engagement and safeguarding needs. Staff will remain alert to the potential challenges faced by these children and will work with families, housing services, local authorities and other agencies to provide appropriate support.

The DSL will consider whether the child may benefit from Family Help, Early Help or additional pastoral support and will monitor attendance and welfare carefully where temporary accommodation is known to be a factor.

Where information is received from housing authorities regarding temporary accommodation, homelessness or housing instability affecting a pupil, this will be considered as part of the school's safeguarding and Family Help response.

Looked-after and previously looked-after children, those in kinship care and special guardianship

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

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

We have appointed a designated teacher, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with **statutory guidance**.

The designated teacher is appropriately trained and has the relevant qualifications and experience to undertake the role effectively.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

Staff recognise that some children are more vulnerable to abuse and will demonstrate the skills required to keep these children safe. Staff will share their concerns about these children with the Designated Safeguarding Lead (or Deputy DSL) in the first instance. That must happen ASAP and always that same day.

Children missing in education, persistently absent or severely absent

Regardless of their circumstances, children are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. We set great store by good attendance at school, adhere to and comply with legislation and relevant guidance including Working Together to Improve School Attendance. We are clear that children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues

Governors monitor attendance and absence carefully and are mindful of the vulnerability of children who are absent from education. We need to know where children are in order to keep them safe and follow-up non-attendance in a timely and robust way, especially where this is repeated.

Our response to persistent / severe absence and children missing from education supports identifying abuse, neglect and exploitation, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

Where we are concerned, we will continue to:

- ensure that we liaise and work effectively with partner agencies
- notify and refer to them formally, in line with local protocols and procedures, e.g. where any pupil 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
- put in place and regularly review risk assessments for individual pupils
- help pupils and parents to access the support they need to overcome any barriers outside of school. This might include an early help assessment/plan where absence is a symptom of wider issues.
- check to ensure the suitability and effectiveness of and attendance at any alternative provision

More information can be found in **Appendix 4**.

Early Years Foundation Stage

This section outlines EYFS-specific safeguarding requirements and signposts to relevant sections of the whole-school policy. It is designed to ensure compliance with the Statutory Framework for the EYFS, KCSIE, and Working Together to Safeguard Children.

1. Designated Safeguarding Lead (DSL) Coverage
    - A DSL or Deputy DSL is always available during EYFS provision, including wraparound care.
    - See: Designated Safeguarding Leads (DSLs) and Key Contacts and Information.
2. Staffing, Supervision and Safer Recruitment

- All EYFS staff are subject to enhanced DBS checks and safer recruitment procedures.
- There will always be a paediatric first aider present in the room, whenever children are eating.
- Staff:child ratios and supervision requirements are strictly followed.
- See: Safer Recruitment Policy and Staff Code of Conduct.

3. Intimate Care and Physical Contact
   - Intimate care is delivered in line with safeguarding principles, respecting children's dignity and privacy.
   - See: Supporting Vulnerable Pupils and Intimate Care Policy.
4. Online Safety and Use of Technology
   - EYFS children do not have unsupervised access to devices.
   - Staff follow strict protocols around mobile phone use and image sharing – staff will not take digital images on any personal device.
   - See: Online Safety, Including Filtering and Monitoring.
5. Recognising and Responding to Concerns
   - EYFS staff are trained to identify non-verbal indicators of abuse or neglect.
   - Attendance will be managed in accordance with Attendance policy.
   - Concerns are reported immediately to the DSL and recorded on CPOMS or paper forms.
   - See: Recognising Abuse and Neglect and Procedures for Reporting Concerns.
6. Working with Families
   - Strong relationships with parents/carers are prioritised.
   - Concerns are shared sensitively and in line with safeguarding procedures.
   - See: Working with Families.

Online safety, including filtering and monitoring

We understand the essentiality of safeguarding children from illegal, potentially harmful and inappropriate online material.

We recognise four categories of online risk:

- Content – exposure to harmful, illegal or inappropriate material.
- Contact – harmful interaction with other users or AI systems.
- Conduct – behaviour which causes harm online, including sharing nudes and semi-nudes.
- Commerce – financial scams, gambling, phishing and exploitation.

We comply with required cybersecurity standards and participate in the Cyber Essentials scheme. We ensure that there are appropriate levels of technical security and physical vigilance to safeguard our systems, staff and pupils. We have put in place appropriate systems and software for filtering, monitoring, reporting and responding to inappropriate content / activity. Filtering system alerts and concerns arising from physical monitoring are recorded on CPOMS and followed-up and categorised appropriately. The DSL leads on this and headline data is shared with governors in regular safeguarding reports so that they can monitor the effectiveness of these systems.

We also understand that technology, the risks and harms related to it and the way that children use it evolve and change rapidly and are mindful that children may have unlimited and unrestricted access to the internet via mobile phone networks and that this might increase the risks children are exposed to. Our whole school approach empowers us to protect and educate our pupils in their use of technology and establishes mechanisms to identify, intervene and, where necessary, escalate any incidents where concerns arise. This means that:

- Pupils and staff are clear about the importance of cyber-security and what is expected and acceptable behaviour online
- Everyone will act on online safety concerns in line with this safeguarding / child protection policy

and associated policies and procedures
- Staff are reminded and updated about online safety matters at least annually and this includes understanding the expectations, applicable roles and responsibilities in relation to cybersecurity, filtering and monitoring
- We include online safety in the curriculum and ensure that every pupil is educated about safe and responsible use in ways appropriate to their age and stage of development.
- We consider additional support for children with SEND to help them stay safe online.
- We ensure that delivery by external visitors is planned and fit for purpose
- We work hard to ensure that children, and parents, know how to minimise and manage online risks and that they know how to report any worries or concerns with adults / staff in school
- We carry out an online safety audit each year and any emergent actions are tracked by senior leaders and governors

The Focus-Trust Artificial Intelligence Policy outlines how we embrace the opportunities presented by AI whilst managing associated safeguarding, privacy and cybersecurity risks.

Staff understand that generative AI may be used to create or distribute harmful content including:
- misinformation and disinformation
- conspiracy theories
- deepfake images, audio and video
- AI-generated nudes and semi-nudes
- impersonation and identity deception
- abusive, bullying or harassing content
- extremist or radicalising material

Staff remain alert to the possibility that AI-generated content may form part of safeguarding incidents and will report concerns to the DSL in line with this policy.

The school will have regard to DfE guidance on screen use in early years settings and ensure screen use is developmentally appropriate and supports children's wellbeing.

Mobile phones

The school seeks to maintain a mobile phone-free learning environment.

Mobile devices will be managed in accordance with safeguarding, behaviour and online safety expectations.

All staff understand online safety risks and must monitor children's use of devices, technology and the internet. Staff must report any concerns to the DSL without delay within the same working day. That must happen ASAP and always that same day.

Please note our separate Online Safety policy.

Staff Procedures for Reporting Concerns about Staff Conduct

If you have any safeguarding concerns about an adult working in, or on behalf of the school, you must report it immediately to the Headteacher. If your concern is about the Headteacher, then you must report it immediately to the Focus-Trust SAIL.

Any and all allegations and low-level concerns will be managed in line with Part Four of KCSIE and

associated Focus-Trust policies, e.g. Low-Level Concerns, Managing Allegations, Staff Code of Conduct, Acceptable Use. When dealing with allegations, we will:

- apply common sense and judgement
- deal with allegations quickly, fairly and consistently, and
- provide effective protection for the child and support the person subject to the allegation.

Whistleblowing - Anyone should feel able to raise concerns about poor or unsafe practice and potential failures in the school or Trust's safeguarding regimes and know that such concerns will be taken seriously by senior leaders. Appropriate whistle-blowing procedures, which are suitably reflected in staff training and staff behaviour policies, are in place in and across all Focus Trust schools. These provide clear direction and enable any concerns to be raised appropriately.

Low-level concerns - The term 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 or college may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- Does not meet the harm threshold or is otherwise not 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 or other personal electronic device, contrary to school policy
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- Humiliating pupils.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

All staff must report Low Level Concerns to the Headteacher the same day

Please see the Focus-Trust Whistleblowing or school's Low Level Concern policies for more information.

Allegations that may meet the harm threshold – Part Four of KCSIE should be followed where it is alleged that anyone working in school, including supply teachers, volunteers and contractors has:

- behaved in a way that has harmed a child, or may have harmed a child and/or
- possibly committed a criminal offence against or related to a child, and/or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The last bullet point above includes behaviour that may have happened outside of school, that might make an individual unsuitable to work with children, this is known as **transferable risk.** Where appropriate an assessment of transferable risk to children with whom the person works will be

undertaken. If in doubt, advice will be sought from the local authority designated officer (LADO). This includes allegations pertaining to Outside of School Settings (OOSS) (KCSIE). In these cases, Headteachers must inform the Focus-Trust SAIL immediately and follow the Managing Allegations Against Staff and Volunteers policy.

All staff must report concerns about adult conduct immediately to the Headteacher. If your concern is about the Headteacher, then you must report it immediately to the Focus-Trust SAIL.

Where someone feels unable to raise an issue in school or with Focus-Trust, or feels that their genuine concerns are not being addressed, other options are open to them:

Protect (national charity offering whistle-blowing advice and support)
T: 020 7404 6609
E: helpline@pcaw.co.uk

NSPCC Whistle-blowing helpline
T: 0800 028 0285
E: help@nspcc.org.uk

Ofsted
T: 0300 123 3155
E: whistleblowing@ofsted.gov.uk

Staff are expected to always follow the Focus-Trust Code of Conduct; this is available to all adults working in or on behalf of the school and will be shared during induction.

Safer Recruitment

All recruitment will be done in line with the Focus-Trust Safer Recruitment policy, which considers KCSIE.

Volunteers undertaking regulated activity will undergo an enhanced DBS and barred list check.

Where the school is subject to the EYFS framework, volunteers must not begin work within EYFS provision until the school has received the volunteer's enhanced DBS certificate, including barred list information.

For volunteers working elsewhere in the school, appropriate safeguarding checks, risk assessment, supervision and management arrangements will be implemented in accordance with KCSIE and the school's safer recruitment procedures.

Training and Induction

- All staff undergo safeguarding and child protection training, as part of induction. This includes online safety and an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. Copies of policies and a copy of Part one of KCSIE are provided to all staff at induction.
- All governors access safeguarding training at induction. This training includes online safety and equips them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in school are effective and support the delivery of a robust whole school approach to safeguarding.
- The DSL and DDSLs undergo training to provide them with the knowledge and skills required

to carry out the role, at least every two years.
- The DSL and DDSLs also undertake Prevent awareness training.
- Those involved with recruitment of staff will undergo safer recruitment training.

Training encourages all members of staff to maintain an attitude of '**it could happen here**' where all forms of abuse, (including child on child abuse), neglect and exploitation are concerned.

Induction training for all new members of staff, including temporary employees or volunteers, includes formal child-protection and safeguarding training which covers:
- Part one of Keeping Children Safe in Education 2026
- the role, identity and contact details of the DSL and Deputy DSLs
- this Safeguarding and Child Protection and related policies, e.g. AUP, online safety, anti-bullying, behaviour, staff code of conduct, whistle-blowing, low level concerns
- the school's safeguarding response to pupils who go missing from education
- an overview of local safeguarding partnership procedures including the continuum of need and early help process.

Copies of core documentation is provided either in paper form or electronically as part of induction / training. Staff must sign a declaration each year which confirms that they have read and understood them.

All staff also receive regular safeguarding and child protection updates, e.g. via email, e-bulletins, staff meetings, at least annually. In addition, staff with specific responsibilities attend multi-agency and specialist training which equips them with the skills and knowledge to safeguard children effectively. e.g. DSLs, SENDCO, mental health first aid / leads.

Staff receive training around cyber-security and online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

DSLs monitor the impact of training and update training accordingly and at appropriate intervals in-line with statutory requirements, safeguarding partner recommendations and best practice. Moreover:
- Induction and staff CPD are reviewed so that we can check that people are receiving meaningful training and know how to apply what they learn in practice
- Staff training is also integrated and aligned with our whole-school approach and curriculum planning.

Record keeping and confidentiality

We know that good information management is crucial for effective safeguarding. We understand our powers and responsibilities to share, hold and use information appropriately.

Clear lines of accountability, effective communication and robust record keeping systems enable us to Identify concerns early and ensure children and families are offered the right help at the right time, track progress and work effectively with partners in children's best interests. They also enable us to monitor and evaluate the effectiveness of what we do.

Staff are proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care. We

manage sensitive information appropriately and our practice complies with legislation, local protocols and national guidance.

Wherever possible, we will seek and share information with consent and respect the wishes of those who do not consent to having their information shared. Governors ensure that everyone is clear about the relevant principles, i.e. the UK GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

Parents have a right to be told about any concerns in respect of their child's welfare and about action that we intend to take or have taken to safeguard and promote it, providing this does not compromise the child's safety, cause undue delay or might impede an investigation.

Where pupils leave the school, child protection files will be transferred securely to the receiving school as soon as possible and within five days of transfer or the start of a new term.

Receipt of safeguarding records will be confirmed by the receiving setting.

Information sharing

The school recognises the statutory expectation to share safeguarding information proactively, lawfully and in a timely manner.

We may share information without consent if, in our judgement, there is a lawful basis to do so. Fears about sharing information will not be allowed to stand in the way of the duty to safeguard and promote the welfare of children.

The school will comply with the Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025.

Staff should understand that safeguarding children and individuals at risk provides a lawful basis for sharing information, including special category personal data where necessary to safeguard children.

The school recognises its responsibilities under the Information Sharing Duty. Where staff hold information that they reasonably believe may be relevant to safeguarding or promoting the welfare of a child, they should consider whether that information may assist another practitioner, organisation or safeguarding partner to better understand, assess or respond to the child's needs or risks. Information will be shared lawfully, proportionately and in a timely manner where this supports safeguarding and welfare outcomes.

Staff should recognise that information relating to parents, carers or other individuals connected to a child may be relevant to safeguarding and promoting that child's welfare and may need to be shared where appropriate.

Policy Monitoring and review

This policy will be reviewed at least annually by the Focus-Trust SAIL and the schools DSL. At every review, it will be approved by the LGB.

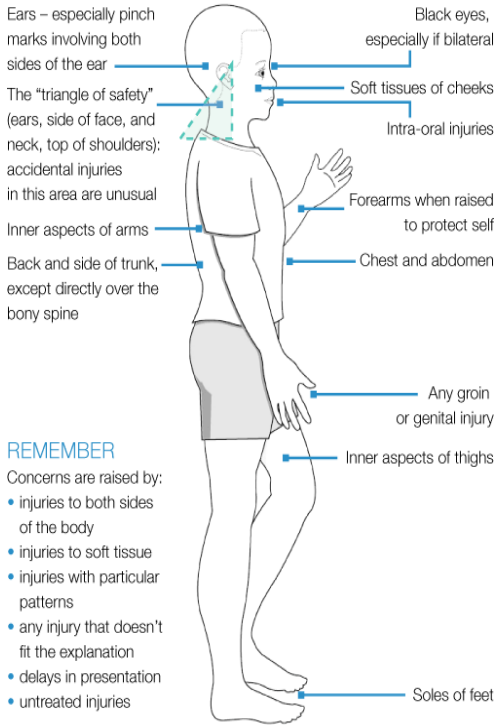
Appendix 1: Categories of abuse, signs and indicators

There are myriad potential indicators, physical, emotional and / or behavioural. Some are quite generic and apply to more than one form of abuse while others are more contextually specific. Similarly, potential indicators might vary considerably from person to person, depending on their experience(s), circumstances and capacities.

Physical abuse

Physical abuse is 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.

Physical Marks and Injuries - things to be mindful of



Marks and Bruising

- Marks or bruising or injuries on children who are not independently mobile
- Multiple or clusters of bruises - these are a common feature in abused children, as are those that are uniform in shape, symmetrical or in parallel, e.g. straight lines, on opposite sides
- In cases of physical abuse the head and face are the areas of the body most commonly injured
- Injuries to the lips - the most common recorded abusive injury to the mouth
- Bruising on the forearm, face, ears, abdomen, hip, upper arm, back of the leg, hands or feet - may have been sustained when children were trying to defend themselves
- Non accidental injuries (NAIs) may carry the imprint of an implement, cord or hand
- Severe bruising to the scalp, with swelling around the eyes and no skull fracture, may occur if the child has been "scalped" – i.e. had their hair pulled violently
- Bruises or marks in fleshy areas / away from bony prominences, especially to the face, back, abdomen, arms, buttocks, ears and hands
- Petechiae (dots of blood under the skin) around them are less common in accidental injuries

Burns and Scalds

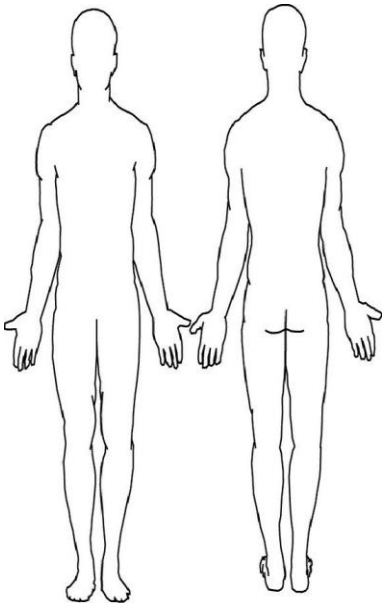
- Intentional immersion scalds usually affect the lower limbs (with or without the buttocks or perineum - bit of skin between genitals and anus). They may also affect both arms and/or both legs like a 'glove' or 'sock'. Characteristically, non accidental injuries might have a clear upper limit to the scalded skin area which is of uniform depth
- Burns can sometimes be deliberately inflicted as part of a cultural belief or traditional remedy, e.g. moxibustion - burning the moxa herb under a glass over the part of the body affected; 'cupping' - causes superficial circular burns, usually on the back

Bites

- Where an adult bites a child sufficiently hard to leave a mark, it is an assault. A bite leaves an oval or circular mark, consisting of two symmetrical, opposing, u-shaped arches separated by an open space. The arcs may include puncture wounds, indentations or bruising.

Recording Using Skin / Body Maps

Marks and injuries fade, disappear and change colour or shape at different rates on different people. It is imperative that a fit-for-purpose record is made by the person who notices a mark or injury and that the DSL is notified without delay, that same day. These should be recorded using the Body Map on CPOMS.



- ✓ Record the following in respect of each mark identified
- ✓ Exact site of injury on the body, e.g. upper outer arm/left cheek;
- ✓ Size of injury - in appropriate centimetres or inches;
- ✓ Approximate shape of injury, e.g. round/square or straight line;
- ✓ Colour of injury - if more than one colour, say so;
- ✓ Is the skin broken?
- ✓ Is there any swelling at the site of the injury, or elsewhere?
- ✓ Is there a scab/any blistering/any bleeding?
- ✓ Is the injury clean or is there grit/fluff etc?
- ✓ Is mobility restricted as a result of the injury?
- ✓ Does the site of the injury feel hot / does the child feel hot / in pain?
- ✓ Has the child's body shape changed?
- ✓ Are they holding themselves differently?
- X **Do NOT** remove clothing unless the site of the injury is available because of treatment;
- X **DO NOT** try to explain what you think caused the marks;
- X **Do NOT** take photographs
- X **Never** in pencil and **do not** use correction fluid or any other eraser

Staff recognise any potential indicators of physical abuse. Staff who notice a mark or injury must make a fit-for-purpose record of this and report it to the DSL without delay and that same day. Any marks or injuries should be recorded using the Body Map on CPOMS.

Emotional Abuse

Emotional abuse is 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 from 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.

Trauma, Mental Health-related and Emotional / Behavioural Indicators

Our staff access training appropriate to their roles and responsibilities, including around attachments, child development, mental health and trauma. We know that 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. Staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

Staff should understand that persistent changes in behaviour, withdrawal, self-neglect, sleep difficulties, self-harm indicators and emotional distress may indicate unmet mental health needs, abuse, neglect or exploitation.

Mental health concerns should never be viewed in isolation and should always be considered through a safeguarding lens.

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. We have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems. While we are conscious that only appropriately trained professionals should attempt to make a diagnosis, staff remain 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.

If staff have a mental health concern about a child that is also a safeguarding concern. Immediate action will be taken in line with this policy and safeguarding procedures, i.e. **any and all concerns around mental health will be reported to the DSL without delay.**

Staff recognise any potential indicators of emotional abuse. Staff who have concerns about a child's mental health or emotional wellbeing must report these to the DSL without delay.

Sexual abuse:

Sexual abuse involves forcing, causing or inciting a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Children who are sexually abused are more likely to know their abuser than not. Staff should be aware that abuse is most commonly perpetrated by someone known to the child. Children under the age of 13 cannot legally consent to any form of sexual activity.

Staff recognise any potential indicators of sexual abuse. Staff must report any concerns about sexual abuse to the DSL without delay.

Neglect

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

Staff recognise any potential indicators of neglect. Staff must report any concerns about neglect to the DSL without delay.

DSLs will:

- familiarise themselves with local tools and models for assessing and responding to child neglect
- regularly review concerns about neglect and give consideration to a referral to local authority children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse.
- be mindful of the need to convey that picture and the child's daily lived experience in referral and other multi-agency processes
- will be well informed and robust when it comes to thresholds, planning and review decisions, questioning, challenging and escalating as appropriate.

Appendix 2: Specific forms of abuse, exploitation and safeguarding issues

Child on child abuse – see Appendix 5 for more detailed information

We recognise that child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator.

The school also recognises that child-on-child abuse is preventable and that early intervention can reduce the likelihood of escalation.

All staff understand the importance of challenging inappropriate behaviours between children that are abusive in nature, examples of which are listed below. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

The term 'child-on-child abuse' refers to a wide range of activities and behaviour. It is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, racism, faith-targeted abuse, prejudice-based bullying and other discriminatory behaviour)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone 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
- Non-consensual sharing of nudes and semi nudes images and or videos
- Making, sharing or possessing nudes and semi-nudes, including AI-generated content.
- 'Upskirting' which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

We are also mindful that:

- Intimate partner relationships can be abusive
- Child on child abuse might manifest differently for boys and girls e.g. girls being touched inappropriately or coerced into sexual activity, boys being initiated into gangs - they may also be experiencing difficulties in respect of masculinity, gender roles and sexual identity
- Such behaviour may also be indicative of a previous or ongoing abusive experience for a perpetrator and / or victim
- Children who have been the victims of violent crime may be especially vulnerable and may respond to this by targeting children who are younger or otherwise perceived to be 'weaker'

- Children with Special Educational Needs and Disabilities (SEND) are three times more likely to be abused than their peers and additional barriers can sometimes exist when recognising abuse in SEND children
- Children who are lesbian, gay, bisexual, or gender questioning can be targeted by their peers. In some cases, a child who is perceived by their peers 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.

Harmful Sexual Behaviour (HSB)

Some children and young people may be at increased risk of exposure to, or of developing, harmful sexual behaviours. This includes children and young people with SEND, have been abused, or have experienced other disruptions to their development or socialisation. When children display sexual behaviour which increases their vulnerability or causes harm to someone else, **staff have a responsibility to provide support and protection.**

Knowing how to distinguish healthy and harmful sexual behaviour in children helps in both supporting healthy and appropriate sexual development and in the protection of children from harm or abuse. HSB can occur online and/or face to face and can also occur simultaneously between the two. HSB should be considered in a child protection context.

In school we refer to the Brook Traffic Light tool to determine the level of risk and intervention required when HSB occurs. DSLs have completed the Brook training and then disseminated this to all staff. Therefore, all staff understand that children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage.

All staff recognise that children can abuse other children and challenge all potentially harmful or abusive behaviour. Staff must report concerns about child on child abuse and harmful sexual behaviour to the DSL without delay within the same working day. That must happen ASAP and always that same day.

DSLs will:

- take a leading role in cases of child on child abuse
- make an immediate risk and needs assessment following a report of sexual violence
- consider the need for a risk assessment following a report of sexual harassment.

Exploitation

Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CCE and CSE 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.

Child criminal exploitation (CCE) and County Lines

CCE occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity. These activities may also involve

the commission of the offences of 'slavery, servitude and forced or compulsory labour and 'human trafficking', as defined by the Modern Slavery Act 2015.

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.
Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.
Children can be targeted and recruited into county lines in a number of locations including any type of schools, educational institution or residential setting. They are also increasingly being targeted and recruited online using social media.

Child sexual exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non- contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can 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.
Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

CSE may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities.

Staff recognise that exploitation is a form of abuse. Any concerns relating to sexual exploitation, criminal exploitation / county lines are safeguarding issues which must be reported to the DSL, without delay.

Radicalisation – see Appendix 4 for more detailed guidance

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence. Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach. It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism. 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 recognise that radicalisation is a form of abuse. Any concerns relating extremism, terrorism and radicalisation, including online, are safeguarding issues which must be reported to the DSL, without delay.

Gang-related Activity and Serious Violence

Staff should be alert to indicators that a child may be at risk of, or involved in, serious violence.

This includes weapon carrying, threats involving weapons, serious assaults, peer conflict and violence associated with exploitation.

Concerns must be reported immediately to the DSL who will assess risk to both the child and others and determine whether a safety and support plan, Family Help response or referral to children's social care or police is required.

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. This includes abusive behaviour in intimate relationships between young people, including coercive and controlling behaviour. 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.

Operation Encompass ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or school should make a referral to local authority children's social care if they are concerned about a child's welfare.

We recognise that children can be victims in their own right when they see, hear or experience domestic abuse.

Domestic abuse is a safeguarding issue. Staff who are concerned about domestic abuse must always seek advice and support from the DSL as soon as they become aware of the possibility of it. Confidentiality, sensitivity and the very careful management of information is imperative.

So-called "Honour"-Based Abuse (including female genital mutilation and forced marriage)

Good awareness around so-called "honour"-based abuse (HBA) is important in safeguarding people of all ages and from an array of communities. It encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.

Regardless of motive, this is abuse and it will be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA. In school, any and all concerns will be reported to the DSL without delay.

Staff are mindful of and will apply the 'one chance rule' i.e. we may only have one chance to listen, gather crucial information and, potentially, save a life. Under no circumstances will attempts be made to mediate or discuss HBV related concerns with parents, carers, siblings, community leaders, elders or anyone other than the DSL in the first instance.

Staff are alert to the possibility of a child being at risk of HBA, or already having suffered HBA and are mindful of and will apply the 'one chance rule'. Any and all concerns about HBA will be reported to the DSL without delay.

DSLs will:
liaise with Local Authority Children's Social Care, police and other agencies as required. Information will be shared promptly and appropriately, risk(s) assessed, and management and support strategies put in place. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important for DSLs to be aware of this dynamic and additional risk factors when deciding what action to take.

Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals from all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of FGM. It can happen anywhere in the world, but most commonly, it is practiced in parts of Africa, Asia, the Middle East and South America.

Breast ironing

The practice uses large stones, a hammer or spatulas that have been heated over hot coals to compress the breast tissue of girls. (Those who derive from richer families may opt to use an elastic belt to press the breasts so as to prevent them from growing).

The mutilation is designed to make teenage girls look less "womanly" and to deter unwanted male attention, pregnancy and rape and is commonly performed by family members, often the mother. Girls are led to believe that it is in their best interests and so often remain silent about it. Research indicates that some fathers may be unaware that the practice is being carried out.

Whilst all staff should speak to the designated safeguarding lead (or a deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal duty on teachers.** If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

Staff are alert to the possibility of FGM occurring, and are mindful of and will apply the 'one chance rule'. Any and all concerns about FGM will be reported to the DSL without delay. Teachers MUST also personally report to the police if they discover that an act of FGM appears to have been carried out on a girl under the age of 18.

Forced Marriage

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.

Forcing someone to marry 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, (physical, emotional or

psychological) threats or any other form of coercion is used to cause a person to enter into a marriage.

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.

It is important to remember that this happens to boys as well as girls and equally important not to assume that this does not happen to children of primary school age. Schools can play an important role in safeguarding children from forced marriage and things which staff need to look out for and bring to the attention of the DSL include:

- requests extended periods of absence
- failure to return from another country
- absence or persistent absence
- changes in behaviour, attendance, performance, punctuality
- withdrawal from school with no appropriate EHE in place
- not being allowed to participate in extra-curricular activities
- sudden announcement of engagement to a stranger

These are not necessarily indicators of forced marriage but things that DSLs need to know about so that they can make an informed assessment about what should happen next.

Child Abuse Linked to a Belief in Possession by Spirits or Witchcraft

Research indicates that the belief in 'spirit possession' or 'witchcraft' is widespread across the world. It is not confined to particular countries, cultures or religions, nor is it confined to new immigrant communities in this country. These beliefs occupy a broad spectrum, and the effects range from harmless to harmful. Belief in spirit possession and witchcraft is not of itself evidence of maltreatment. Although the number of known child abuse cases linked to accusations of 'spirit possession' or 'witchcraft' in Britain is small, it is possible that a significant number of cases go undetected. The nature of the abuse can be particularly disturbing and the impact on the child is substantial and serious.

There are links between 'spirit possession' and 'witchcraft' and exploitation in that belief in magic or witchcraft may be used to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation.

The term spirit possession' means that a force, spirit, god or demon has entered a child and is controlling him or her resulting in a change in health or behaviour. Sometimes the term 'witch' or 'witchcraft' is used. This is the belief that a child is able to use an evil force or supernatural powers to harm others. There is a range of terminology connected to such beliefs, for example black magic, kindoki, ndoki, the evil eye, djinns, voodoo, obeah and child sorcerers.

Families, carers and the children involved can hold genuine beliefs that evil forces are at work. Families and children can be deeply worried by the evil that they believe is threatening them. There may also be an element of the adult gaining some gratification through the ritualistic abuse of the child, which may even result in the death of the child.

In cases of 'spirit possession' or 'witchcraft' which involve children, the parent/carer views the child as 'different' and attributes this to the child being 'possessed'. This can lead to attempts to exorcise the child. Perceptions of and around 'difference' can be varied and include disobedience, independence, bedwetting, nightmares or illness. In some cases there will be no obvious difference and the child will have been targeted because they are perceived to be 'spiritually' different. The

attempt to exorcise may involve beating, burning, starvation, cutting/stabbing and/or isolation within the household, all of which obviously constitute abuse.

Potential indicators of abuse linked to belief in spirit possession include:

- a child reporting that they are, or have been, accused of being 'evil', and/or that they are having the 'devil beaten out of them'
- signs of physical abuse (see above)
- children becoming noticeably confused, withdrawn, disorientated or isolated
- deteriorating personal care
- irregular attendance or child being taken out altogether
- lack of parental concern or attachment

Obviously, these may also be common features in other kinds of abuse.

Appendix 3 – CME, EHE and AP

We adopt a pro-active and robust approach to promote good attendance and punctuality. For example:

- Whole school approach and everyone's responsibility
- Clear and regular messaging about our high expectations
- Supporting pupils and parents to address causes wherever possible and to stop things from *becoming* problematic
- Planned, supported and tracked transitions into EYFS and to Secondary School
- Robust and compliant maintenance of registers
- Prompt and robust first responses to none attendance, including having more than one contact number for each pupil as this gives us additional options to make contact with a responsible adult when a child does not attend school, is missing education and / or where there is a welfare and/or safeguarding concern
- Conducting home visits where necessary
- Attendance Panels and Plans where attendance is too low
- Working closely with the LA, e.g. APSOs
- Monitoring, analysing and tracking data so we understand and can respond to patterns and challenges and gauge the impact of our interventions

We are clear that children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines.

Our response to persistent absence and children missing from education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

In line with the DfE's Working Together to Improve School Attendance guidance, we monitor the attendance of vulnerable pupils particularly closely, e.g. pupils:

- with lower attendance than their peers
- at risk of becoming persistently absent
- persistently absent
- severely absent
- with medical conditions or SEND with poor attendance
- with a social worker
- about whom there are existing safeguarding or welfare concerns

Where we are concerned, we will continue to:

- ensure that we liaise and work effectively with partner agencies
- notify and refer to them formally, in line with local protocols and procedures, e.g. where any pupil 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
- put in place and regularly review risk assessments for individual pupils - *see example over*
- check to ensure the suitability and effectiveness of and attendance at any alternative provision

Elective Home Education (EHE)

Schools must inform their LA of all deletions from their admission register when a child is taken off roll. We comply with the guidance.

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, we will work together with the local authority and other 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 and we will work closely with the local authority to ensure that any assessments and plans are reviewed, in consultation with parents and carers.

We also acknowledge that there is no proven correlation between home education and safeguarding risk. Moreover, some parents who educate at home believe that by doing so, they are safeguarding the child from risk in the school system.

However, a child being educated at home is not necessarily being seen on a regular basis by professionals and this logically increases the chances that any parents who set out to use home education to avoid independent oversight may be more successful by doing so. Child Safeguarding Practice Reviews have illustrated this in recent years. We will take all necessary steps to safeguard and promote the welfare of any children about whom we have concerns in this context.

Children Attending Alternative Provision

We are also mindful of the fact that children accessing alternative provision might, potentially, be especially vulnerable to abuse and exploitation. Where a pupil attends alternative provision, we retain responsibility for the safeguarding of that pupil, and will always satisfy ourselves that the provider meets the needs of the pupil. To this end, we will obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of our own staff.

We retain overall responsibility for pupils on our roll. Consequently, in-line with KCSIE, we:

- agree at placement meetings what will happen if a pupil does not attend
- ensure that our DSL monitors those children and young people especially closely
- communicate on a regular basis (at least half termly) with providers in order to gauge and monitor attendance, progress and effectiveness.

The school will maintain oversight of all pupils attending alternative provision. The DSL will maintain oversight of safeguarding information exchange between the school and Alternative Provision.

Reviews will take place at least half-termly and immediately if safeguarding concerns arise.

The school will obtain written confirmation of safeguarding arrangements and any staffing changes that could affect pupil safety.

Appendix 4: Radicalisation - What research tells us to be mindful of

Vulnerability	Online	On the Ground
Almost all children and young people referred as at risk of radicalisation are young men Commonly identified vulnerabilities include: - looking for connection and struggling with social relationships - sense of belonging (i.e. wanting to be needed, seeking a group. Distinct from, but often linked to, social isolation) - low confidence / self esteem - mental health problems - autism (with children and young people being more vulnerable to developing fixations and finding it more difficult to shift their viewpoints) - other learning needs (such as communication and language difficulties, Attention Deficit Hyperactivity Disorder (ADHD), or Obsessive-compulsive Disorder (OCD)) - neglect - past trauma including exposure to domestic abuse	Particularly associated with radicalisation to Extreme Right-Wing and mixed/unclear ideologies Exacerbated where parents have an insufficient understanding of the risks and threats linked to online platforms Children being groomed or radicalised through online discussion forums social media platforms or online games acting as introductory spaces Online influences became more significant during the COVID-19 pandemic – more time online, increased isolation exacerbated some underlying vulnerabilities	Increase in referrals relation to Extreme Right-Wing ideology coincided with international or local events, such as local activity by Extreme Right-Wing political parties, elections and referendums, and local immigration Familial influences remained important in relation to Islamist extremist and Extreme Right-Wing ideologies

Risk indicators

Indicators of an identity crisis:

- Distancing themselves from their cultural/religious heritage
- Uncomfortable with their place in society

Indicators of a personal crisis including the following:

- Family tensions
- A sense of isolation
- Low self-esteem
- Disassociation from existing friendship groups
- Searching for answers to questions about identify, faith and belonging

Indicators of vulnerability through personal circumstances:

- Migration
- Local community tensions
- Events affecting their country or region of origin
- Alienation from UK values
- A sense of grievance triggered by personal experience of racism or discrimination

Indicators of vulnerability through unmet aspirations:

- Perceptions of injustice
- Feelings of failure
- Rejection of civic life

Indicators of vulnerability through criminality:

- Experiences of dealing with the police
- Involvement with criminal groups

Making a judgement

When making a judgement, staff will ask themselves the following questions:

- Does the pupil have access to extremist influences?
- Does the pupil access the internet for the purposes of extremist activities (e.g. using closed network groups, accessing or distributing extremist material, contacting covertly using Skype)?
- Is there a reason to believe that the pupil has been, or is likely to be, involved with extremist organisations?
- Is the pupil known to have possessed, or be actively seeking, extremist literature/other media likely to incite racial or religious hatred?
- Does the pupil sympathise with or support illegal/illicit groups?
- Does the pupil support groups with links to extremist activity?
- Has the pupil encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political or religious influence on the pupil?
- Have international events in areas of conflict and civil unrest had a noticeable impact on the pupil?
- Has there been a significant shift in the pupil's outward appearance that suggests a new social, political or religious influence?
- Has the pupil come into conflict with family over religious beliefs, lifestyle or dress choices?
- Does the pupil vocally support terrorist attacks; either verbally or in their written work?
- Has the pupil witnessed or been the victim of racial or religious hate crime?
- Is there a pattern of regular or extended travel within the UK?
- Has the pupil travelled for extended periods of time to international locations?
- Has the pupil employed any methods to disguise their identity?
- Does the pupil have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the pupil display a lack of affinity or understanding for others?
- Is the pupil the victim of social isolation?
- Does the pupil demonstrate a simplistic or flawed understanding of religion or politics?
- Is the pupil a foreign national or refugee, or awaiting a decision on their/their family's immigration status?
- Does the pupil have insecure, conflicted or absent family relationships?
- Has the pupil experienced any trauma in their lives, particularly trauma associated with war or sectarian conflict?
- Is there evidence that a significant adult or other person in the pupil's life has extremist views or sympathies

Critical indicators include where the pupil is:

- In contact with extremist recruiters.
- Articulating support for extremist causes or leaders.
- Accessing extremist websites.
- Possessing extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining extremist organisations.
- Making significant changes to their appearance and/or behaviour.

Appendix 5: Child on Child Abuse including Sexual Violence and Sexual Harassment & Harmful Sexual Behaviours

Some children and young people may be at increased risk of exposure to, or of developing, unhealthy sexual behaviours. These include children and young people who have a disability, have been abused, or have experienced other disruptions to their development or socialisation. When children display sexual behaviour which increases their vulnerability or causes harm to someone else, **staff have a responsibility to provide support and protection.**

Knowing how to distinguish healthy and harmful sexual behaviour in children helps in both supporting the development of healthy sexuality and in the protection of children from harm or abuse. HSB can occur online and/or face to face and can also occur simultaneously between the two. HSB should be considered in a child protection context.

SWGFL HSB Resources for Schools

What's healthy and what's not?

Safe and healthy →

Behaviours are:	Behaviours are:	Behaviours are:
displayed between children or young people of similar age or developmental ability reflective of natural curiosity, experimentation, consensual activities and positive choices	unusual for that particular child or young person of potential concern due to age, or developmental differences of potential concern due to activity type, frequency, duration or context	Excessive secretive compulsive coercive, degrading or threatening involve significant age, developmental, or power differences of potential concern due to activity type, frequency, duration or context

Many expressions of 'sexual' behaviour may not be primarily sexual in nature. Those that are may themselves be part of healthy development and give no cause for concern.
Factors which can influence such behaviour are known to include:

- sexual excitement or curiosity
- sensory issues;
- lack of sex and relationships information / education
- lack of privacy
- boredom, loneliness, anxiety, confusion or depression
- family/carer conflict
- lack of appropriate models / boundaries
- trauma inc. emotional, physical, sexual abuse and neglect
- communication / sensory difficulties
- attachment / relationship needs / issues
- gender, masculinity and / or identity issues
- copying the behaviour of others / behaviour seen on the internet or TV.

Research suggests that a very significant proportion of child sexual abuse is committed by someone under the age of 18. Sexual behaviour between children is also considered harmful if one of the

children is much older – particularly if there is more than two years' difference in age or if one of the children is pre-pubescent and the other isn't. However, a younger child can abuse an older child, particularly if they have power over them, greater capacity etc.

Research also tells us that children and young people who harm others sexually are more likely to:

- have poor self-regulation and coping skills
- experience social anxiety and a sense of social inadequacy
- have less well developed and internalised rules for social behaviour
- possess a poorly developed or primitive sense of morality
- lack secure and confident attachments to others
- exercise limited self-control, and act out their emotional experiences through negative or otherwise inappropriate behaviour
- Have little insight into the feelings and needs of others and, indeed, their own mental states
- Place their own needs and feelings ahead of the needs and feelings of others
- Exhibit a poorly defined sense of personal boundaries
- Have developed strong and not easily corrected cognitive distortions about others, themselves, and the world they share
- Have deficits in social skills and in social competence overall.

Normal	Inappropriate	Problematic	Abusive	Violent
Developmentally expected Socially acceptable Consensual, mutual, reciprocal Shared decision-making	Single instances of inappropriate sexual behaviour Socially acceptable behaviour within peer group - Context for behaviour may be inappropriate - Generally consensual and reciprocal	Problematic and concerning behaviour Developmentally unusual and socially unexpected No overt elements of victimisation Consent issues may be unclear May lack reciprocity or equal power May include levels of compulsivity	Victimising intent or outcome Includes misuse of power Coercion and force to ensure victim compliance Intrusive Informed consent lacking or not able to be freely given by victim May include elements of expressive violence	Physically violent sexual abuse Highly intrusive Instrumental violence that is psychologically and/or sexually arousing to the perpetrator Sadism

Ref: S, Hackett

***It is important to understand and assess overlap, not least the 'line' between harassment and violence and when it may have been crossed.**

Central Tenets of Our Approach

- Our **whole school** approach means that **all relevant and associated policies** and procedures

are clear, consistent, up-to-date and embedded, e.g. online safety, promoting positive behaviour; measures to prevent all forms of bullying (including cyberbullying, racism, faith-targeted abuse, prejudice-based bullying and other discriminatory behaviour).

- Our culture, policies and procedures seek minimise the risk of child-on-child abuse. The systems we have in place are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously.
- We adopt a **zero tolerance** approach. Worrying or unacceptable behaviour is never acceptable and will never be passed off as "banter", "just having a laugh", "part of growing up" or "boys being boys". We recognise that this can lead to a culture of unacceptable behaviours and an unsafe environment for children. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.
- We comply with statutory guidance on **Relationships and Sex Education**. In so doing, we seek to put in place the key building blocks of healthy, respectful relationships, focusing on family and friendships, in all contexts, including online. This sits alongside the essential understanding of how to be healthy.
- We are a 'listening school' and seek to empower children by **breaking down barriers and giving them a voice**. We build appropriate, nurturing relationships via which staff act as positive role models at all times and have systems in place via which children can express / report any worries or concerns. These are **well promoted, easily understood and easily accessible.**
- Our aim is to prevent and **minimise the possibility** of abuse although we recognise that even if there are no reported cases of child-on-child abuse, **it may still be taking place**. Children and young people who abuse others are responsible for their behaviour and safeguarding action must include addressing that behaviour and its causes. Responses should be **proportionate** and should **not criminalise children unnecessarily.**
- Children may not find it easy to tell staff about their abuse verbally. Some children may not be able to communicate verbally while others may face **additional barriers**. 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.
- **Pre- planning, effective training and policies** also provide us with the foundation for a calm, considered and appropriate response to any reports.
- Governors ensure that the school contributes to **multi-agency working in line with statutory guidance.** Where necessary, we consult with external agencies in order to seek advice, contribute to multi-agency assessment, planning and support and, where necessary, criminal justice and other proceedings.
- We reflect on any issues / incidents and reflect on our response(s) to them, i.e. we constantly evaluate what we do and how we do it to ensure that we remain fit-for-purpose and robust.

Responding to Concerns, Reports and / or Allegations of Child On Child Abuse, Sexual Violence or Sexual Harassment

(a) Guidance for Staff

1. Worrying or unacceptable behaviour will never be ignored, accepted or be passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'.
2. If staff have **any** concerns about a child's welfare, they should act on them immediately rather than wait to be told. Abuse that occurs online or outside school or is non recent must not be downplayed and should be treated equally seriously.
3. Someone reporting a concern or making an allegation will never be made to feel rushed, ashamed, responsible, as though they are being difficult or creating a problem. It is essential that 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.

4. Where listening to a report is concerned, everyone will follow the guidance in this policy. An initial 'disclosure' to a trusted adult may only be the first incident reported, rather than representative of a singular incident. (Trauma can also impact memory so children may not be able to recall all details or timeline of abuse).
5. It is also 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.
6. Any and all concerns relating to child-on child abuse - HSB, sexual violence and / or sexual harassment - will be raised with the DSL / DDSL without delay / as soon as practically possible and a fit-for-purpose professional record made.

(b) Guidance for DSL / DDSLs (see table and decision-matrix over the page)

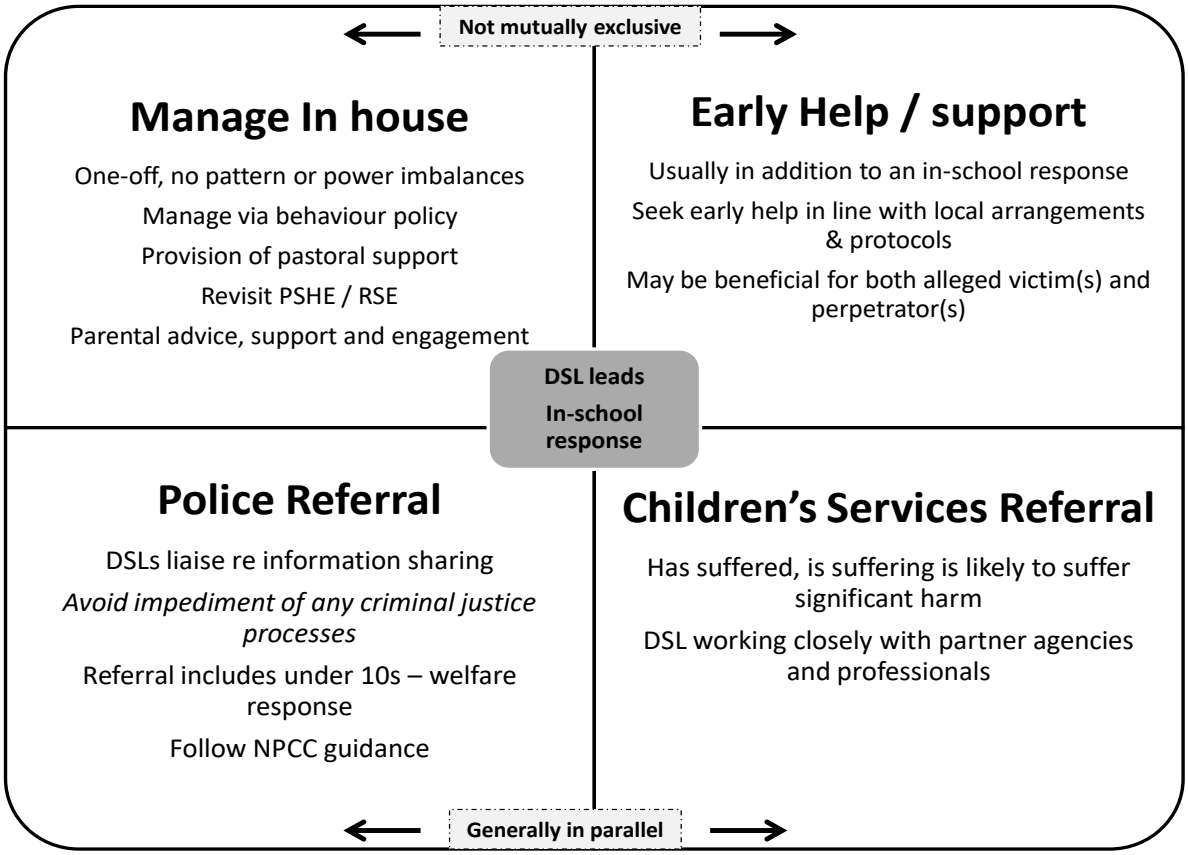
Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Any plan to reduce and / or manage risk posed by a child who is alleged to have abused another must also address their needs and staff must be alert to the possibility that a child or young person who has harmed another may also be a victim; as such, they may have significant unmet needs themselves. They may also be suffering, or at risk of suffering, significant harm and be in need of protection. Taking disciplinary action and providing appropriate support, can, and should, occur at the same time if necessary.

Decisions will be made on a case-by-case basis, with the DSL / DDSL taking a leading role and using their professional judgement, supported by other agencies, as required.

Key Considerations for DSLs

Sense Making	Actions
Nature and seriousness of alleged incident(s) Ages & developmental stages of those involved Any power imbalance(s) / capacity issues One-off or part of a pattern Part of an established relationship Aggravated or experimental	**Violence** - immediate risk and needs assessment **Harassment** - risk assessment on case-by-case basis Immediate steps to protect and support those involved and other children Wishes of victim / confidentiality / information sharing Any potential implications for other CYP inc. siblings Any wider issues within local area, emergent trends or patterns – work with safeguarding partners **Record** Ongoing review of risk assessments and support plans

Response Options for DSL / Deputy DSLs



Making Decisions which Safeguard and Support

Risk management and support will be considered immediately, i.e. without delay in **every case.** The basic safeguarding principle is:

- if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority **children's social care**, and
- rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the **police**.

In making what can be difficult decisions, DSL / DDSLs will always consider:

1. the age and the developmental stage of the victim
2. the nature of the allegations, and
3. the potential risk of further abuse.

Decision makers should also be mindful that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s). Overall, decision making and responses are underpinned by the following principles:

- The needs and wishes of the victim will be our paramount consideration (along with protecting the child). It is important they feel in as much control of the process as is reasonably possible.
- Wherever possible, the victim, if they wish, should be able to continue in their normal routine. (Overall, our priority will be to make the victim's daily experience as normal as possible, so that the school is a safe space for them).

All concerns, discussions, decisions and reasons for them will always be recorded.

DSLs will make these decisions, with appropriate advice. Parents or carers should normally be informed (unless this would put the victim at greater risk).

Ultimately, the DSL / DDSL will need to balance the victim's wishes against their duty to protect the victim and other children. Any decision to make a referral to local authority children's social care and/or a report to the police against the victim's wishes must be handled extremely carefully. The reasons should be explained to the victim and appropriate specialist support offered.

The school recognises the statutory expectation to share safeguarding information proactively, lawfully and in a timely manner.

The school will comply with the Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025.

Staff should understand that safeguarding children and individuals at risk provides a lawful basis for sharing information, including special category personal data where necessary to safeguard children.

Anonymity

Where a case is progressing through the criminal justice system the DSL / DDSL will continue to lead on the school's behalf, in consultation with the Principal and will be mindful of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately. This also requires that they consider what staff 'need to know' and how to manage any associated social media issues.

Unsubstantiated, Unfounded or Malicious Reports

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to local authority children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the school will consider whether any disciplinary action is appropriate against the individual who made it as per our behaviour policy.

Appendix 6: National Organisation's contact details

Concerns About People / Families	
National Domestic Abuse Helpline (24hrs)	0808 2000 247
Help at Hand (Children's Commissioner / LAC)	0800 528 0731 E: help.team@childrenscommissioner.gov.uk
Counter Extremism Helpline	020 7340 7264 (Mon-Fri,9am-6pm excl bank holidays) E: counter.extremism@education.gov.uk
Anti Terrorism Hotline	0800 789 321
ACT Early (counter terrorism support line)	0800 011 3764
CEOP NCA Safety Centre	https://www.ceop.police.uk/Safety-Centre/
Shelter emergency helpline	0808 800 4444
NSPCC FGM Helpline	0800 028 2550 E: fgmhelp@nspcc.org.uk
Forced Marriage Unit (FMU)	**020 7008 0151** **E: fmu@fco.gov.uk**
Modern Slavery Helpline	**08000 121 700**
Trafficked Children Helpline	**0808 800 5000** **E: help@nspcc.org.uk**
Karma Nirvana	https://karmanirvana.org.uk/
Afruca	https://afruca.org/
SENDIASS	SENDIASS website
Victim Support	**0808 16 89 111**
Stop It Now Helpline (Child Sexual Abuse)	**08081000900**
ChildLine	**080011 11**
UK Safer Internet Centre Professionals Helpline	**0344 381 4772** **E: helpline@saferinternet.org**
Shelter emergency helpline (housing and homelessness)	**0808 800 44 44**
Runaway Helpline (call or text free)	**116 000**
MIND	0300 123 3393
The Survivors Trust (national umbrella agency for specialist rape and sexual abuse support organisations for women, men, young people and children)	08088 010818
National Association for People Abused in Childhood (NAPAC)	**0808 801 0331**
Papyrus	**0800 068 41 41**
Samaritans	**116 123**
Concerns About Culture / Whistle blowing	
Protect (national charity, free whistle-blowing support)	020 7404 6609 E: helpline@pcaw.co.uk
NSPCC Whistle-blowing helpline	0800 028 0285 E: help@nspcc.org.uk
Ofsted	0300 123 3155 E: whistleblowing@ofsted.gov.uk

Appendix 7: Golden Rules to recording on CPOMS

- It is vital that **concerns are recorded and reported accurately** by all staff, (including visitors, and staff not directly employed by the school, e.g. contractors and third-party staff) as soon as after the concern arises and before they leave the premises. **The School MUST also be proactive in responding to concerns raised as early as possible.**
- Promoting the welfare of and safeguarding children is the responsibility of **all** school staff. Staff working with children should maintain an attitude of '**it could happen here'** where safeguarding is concerned. When concerned about the welfare of a child, staff should always **act in the best interests** of the child.
- However small or apparently insignificant the concern may seem at the time; the importance of recording and reporting cannot be underestimated when considering welfare and child protection. **Not all welfare concerns result in a referral to children's social care.**
- Keeping Children Safe in Education (KCSIE) is clear that **it is important for children to receive the right help at the right time to address safeguarding risks, prevent issues escalating and to promote children's welfare**. Research and serious case reviews have repeatedly shown the dangers of failing to take effective action. Examples of poor practice include:
    - Failing to act on and refer the early signs of abuse and neglect.
    - Poor record keeping.
    - Failing to listen to the views of the child. o Failing to re-assess concerns when situations do not improve.
    - Not sharing information with the right people withing and between agencies.
    - Sharing information too slowly; and o A lack of challenge to those who appear not to be taking action.
- **Remember GDPR**. These records could be requested in a SAR. **Your log on CPOMS maybe a vital piece of evidence in court**. However, **your record should always use full names, of children and staff, not initials**.

When recording a concern, the record must be:

Accurate	• Be specific. • Use a body map if the concern relates to a part of the body, and describe the injury/bruise/mark etc. • Include the voice of the child, using their exact words or phrases. • Use neutral language.
Adequate	• Be written for a range of audiences, both internally and externally, e.g Local Authority Children's Social Care, Police.
Comprehensive	• Include context that led up to incident. • Include immediate actions taken and any action taken to speak to children involved in the concern. • Any further actions taken (such as a referral being made). • The reasons why a decision was made not to refer to a statutory agency (if relevant).

Factual	• Answer who, when, why, what • Justify any subjective statements with evidence- it is essential that fact is differentiated from opinion. Opinions can be expressed, but it is important that phrases such as 'in my opinion' or • 'in my view' are used and justified with evidence. • Direct observations must be recorded and clearly noted as 'I observed' or 'I witnessed'
Relevant	• Include all information relating to the concern, including the context. • Do not include information which is not relevant.
The name and role of the person/s.	• To whom the concern was made • The **full names** of all parties involved in the incident e.g., Jenny Smith, DSL, Bob Day, Class • Teacher
Timely	• Recorded and passed on as soon as possible on before the end of the school day.

WAGOLL:

I saw three equally spaced apart 1" marks on the right forearm of Teddy Davis, (see body map) when Teddy rolled up their sleeves to paint a picture. The marks appeared to be cuts which had healed due to the presence of a scab on each. I asked Teddy about the marks and Teddy replied 'I fell over'. I sent Teddy to the medical room. Mr Robinson- first aider- felt that the cuts were superficial, healing and required no medical attention.

I raised the concern with Fay Bedford- DDSL -verbally. DDSL asked for the concern to be recorded and requested that a phone call is made to the family to discuss observations about the marks and record discussion points on CPOMS. I recorded the concern and discussion points. DSL will action from this point as necessary.

During lunchtime play today, Sarah approached me and was crying. I asked her what the matter was and she replied – 'I don't like my life anymore' I asked her why and she replied – 'My mum and her boyfriend argue all the time, they always have cans of stuff which they drink, I really don't want to go home today because they are having a party tonight and that man will be there- you know that one.... ' I told Sarah that I did not know what man she meant, but when I said this, she ran off to play with her friends. Verbally passed on information immediately to DSL and also recorded the information on CPOMS.

Appendix 8: Golden Rules for DSLs when responding:

What are the risks?	Consider all pieces of information you have available ('contextual safeguarding'): • Attendance and punctuality • Family members and relationships • Previous CP/Welfare concerns • Any behaviour/bullying concerns • Relationships between those involved in the concern. • Peer group and influences • Environmental factors • Other relevant factors inside or outside the school – consider online media. • Other children in the school if there has been child on child behaviour.
What is needed to establish the best course of action?	• Who in the school has more information that can add to your understanding? SENDCo, Class teacher, Pastoral Team, First Aid etc • Does the concern need to be referred to an external agency (e.g., MASH, police)?
What will be recorded by the DSL?	• What action(s) were taken, by whom and why, what was the rationale? Include timeframes as relevant. • What measures have been put in place to ensure the child is safe? Who is going to do this and when will they feedback to the DSL? • Will the record need to be reviewed to ensure the child remains safe? When will that review take place? Make sure you put in a date. • If the plan is to 'monitor', what will this look like, What are you monitoring, Who will do this and How often will it be reviewed? The review needs to be recorded, evidencing whether the plan is working or not and whether there are any changes to the plan.

WAGOLL:

Having reviewed the information and first aid records this is the first occasion that Ted Day has been identified as presenting physical marks.

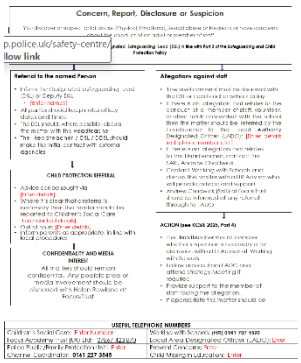
Telephone call @11:10am. Fay Bedford (DDSL) rang Ted's mum, who stated that Ted had slipped over on Saturday 03/09/22 in the kitchen on some spilt water and caught his arm on the corner of a kitchen worktop. Ms Day said that she was unaware that Ted had injured himself.

Mum and dad live together with Ted only child. Ted's attendance and punctuality is good (98.7%, no late marks). Mrs Johnson (class teacher) has no concerns about Ted and contacts with the family have been positive and supportive. There are no previous reports of attendance for first aid. There are no concerns about Ted's behaviour in school.

Having analysed the information and spoken to the mother of Ted there are no additional actions required at this time. Should further concerns be reported this can be reviewed.

Appendix 9: Other resources

- Focus-Trust Safeguarding Team contains up to date information
- Focus-Trust Safeguarding Padlet: Full of links to other pieces of support / information
- CPOMS guides (correct links at the time of publication):
    - Reports
    - User guide
- Nominated Safeguarding Planner – available from the Focus-Trust Safeguarding Team, or direct from Andrew Chadwick (SAIL)
- Supervision guide – available from the Focus-Trust Safeguarding Team, or direct from Andrew Chadwick (SAIL)
- Supervision record / Child Protection Register format – available from the Focus-Trust Safeguarding Team, or direct from Andrew Chadwick (SAIL)
- Suggested CPOMS Categories – available from the Focus-Trust Safeguarding Team, or direct from Andrew Chadwick (SAIL)
- Safeguarding Procedures Flowchart – must be displayed thoughout school, is available from All Staff Team, General, Policies


Concern, Report, Disclosure or Suspicion

p.police.uk/safety-centre/

low link

Referral to the named Person

CHILD PROTECTION REFERRAL

CONFIDENTIALITY AND MEDIA INTERES

Allegations against staff

ACTION (see KCSIE 2025, Part 4)

USEFUL TELEPHONE NUMBERS