Safeguarding and Child Protection Policy

including knowledge base and processes

Charterhouse Square School

England

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Registered in England & Wales - Cognita Schools Limited No. 02313425
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Document contents

The structure of this document is outlined below. The intention is to allow for swift and easy access to the information you might need using direct links.

Part 1: Safeguarding in our school

A. Introduction
B. Commitment
C. Principles
D. Scope
E. Definitions and Terminology
F. Key Contacts
G. Roles and Responsibilities
H. Training Requirements
I. Information Sharing and Data Protection
J. Policy Review
K. Governance Arrangements
L. Legal Considerations
M. Related Documentation
N. Teaching pupils about safeguarding
O. Online Safety
P. Child's Voice
Q. Safer Recruitment
R. Working in Partnership with Parents/Carers
S. Multi-Agency Working Arrangements

Part 2: Knowledge Base

A. Categories of abuse: Physical, Emotional, Sexual, and Neglect
B. Domestic Abuse, incorporating controlling or coercive behaviour, and CAPVA
C. Child on Child Abuse (including harassment and violence)
D. Problematic Sexual Behaviour, Harmful Sexual Behaviour, Sexual Harassment and Sexual Violence
E. Child Criminal Exploitation (CCE) and Serious Violence
F. Child Sexual Exploitation (CSE), including group CSE
G. Financially Motivated Sexual Extortion (FMSE)
H. Self-Generated Imagery / Videos (also known as sharing nudes/semi nudes), including those that are AI-generated
I. AI Generated Child Sexual Abuse Material
J. Honour Based Abuse
K. Forced Marriage

L. Female Genital Mutilation, Virginity Testing, Hymenoplasty, and Breast Flattening
M. Faith/belief-related Abuse
N. Behavioural indicators in children
O. Behavioural indicators in adults
P. Grooming
Q. Radicalisation
R. Adverse Childhood Experiences
S. Mental Health
T. Children who may have specific vulnerabilities
U. Stages of early intervention and child protection
V. Contextual Safeguarding and Extra-Familial Harm
W. Signposting to further information

Part 3: Processes

Procedures and guidance that support schools to implement effective and successful safeguarding:

A. Reporting and recording in relation to pupils
B. Reporting and recording in relation to adults (not parents/carers) including:

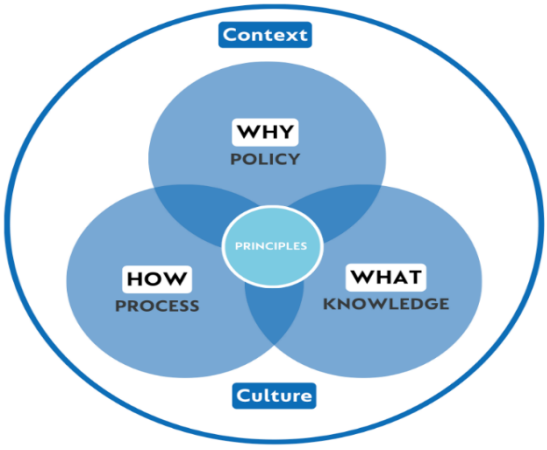
    1. Expectations of staff conduct
    2. Low-Level concerns
    3. Self-Reports
    4. Allegations

C. Whistleblowing
D. Managing situations involving child on child abuse
E. Managing situations involving self-generated intimate imagery/videos (also known as sharing nudes/semi-nudes) including those generated by AI
F. Managing situations involving PSB, HSB, Sexual Harassment and Sexual Violence
G. Managing situations involving mental health
H. Visiting Speakers
I. Lettings for individuals and organisations

Part 1: Safeguarding in our school

A Introduction

Establishing a strong culture of care for our pupils is our number one priority. This policy provides the framework for this to be lived and is divided into three main parts (see visual).



WHY – Policy

Our commitment and guiding principles to safeguarding.

WHAT – Knowledge

The knowledge we need to know to effectively engage with our safeguarding processes.

HOW – Process

The processes required to ensure effective safeguarding in our schools.

Whilst these areas provide the basis for our work, there are two other essential elements to consider: context and culture.

Context

Each school serves a distinctive community. Whilst there are universal principles and processes in safeguarding, an individual school community may also have specific contextual features that impact the safeguarding risks and considerations for pupils. These will in turn influence a school's approach to the implementation of policy.

Culture

School culture is the collection of values, expectations and practices that guide and inform the work of all members of a school community. Language, action, and behaviours tell you about the culture in a school. The safeguarding policy is important, but only when actively lived every day in the culture of the school. Safeguarding is a shared responsibility for every member of the school

community, and staff are part of the wider safeguarding system for children. Creating a strong safeguarding culture is essential to providing the most effective environment for our pupils to thrive in all aspects of their development.

B Commitment

We are committed to safeguarding and promoting the welfare, physical and mental health, and safety of each pupil. We will do this by creating and maintaining an open, inclusive, caring, and supportive atmosphere where each pupil may thrive and develop physically, socially, emotionally, and academically. It is our responsibility to ensure that all pupils have equal rights to be protected from harm and abuse and the right to feel safe.

This includes:

- Proactively teaching pupils about safeguarding
- Ensuring that systems and processes are in place to protect pupils; and
- Acting in the best interests of the pupil

C Principles

Our principles of safeguarding are universal and apply to all Cognita schools. They have been developed by the Cognita Regional Safeguarding Leads and take account of the International Taskforce for Child Protection, the United Nations Rights of the Child, and globally leading practice.

1. Everyone has a responsibility to support the protection of pupils.
2. All staff will maintain an attitude of 'it could happen here and be educated in understanding the types and indicators of abuse, neglect, and exploitation, and the consequent duty of care they hold to notice any potential harm to pupils.
3. All staff will adopt a child-centred approach within a whole family focus, working in partnership with parents/carers as far as possible. Staff will be empowered to act in the best interests of the pupil to protect them from harm and take appropriate actions if any concerns arise. The pupil's welfare is paramount.
4. All staff will know our pupils well, are in a position to identify concerns early, and offer timely support to those who have experienced, or are at risk of experiencing, an adverse childhood experience so as to prevent concerns from escalating. They must act on any concerns about a pupil **immediately.** They must not assume that another colleague will take action and share information that might be critical in keeping pupils safe.

5. All pupils will be empowered to be able to voice their opinions, and to share their thoughts and beliefs within the safe environment of the school. Pupil's wishes and feelings are sought, heard, and responded to using a variety of systems which are well promoted, and easily understood and easily accessible for pupils to confidentially report any form of abuse or neglect, knowing their concerns will be treated seriously that they can safely express their views and give feedback.
6. All pupils will be educated to be aware about how to manage risk, identify harmful behaviours, both online and offline and seek help when needed.
7. All adults who work with or for the school will have been safely recruited.
8. Effective safeguarding is anti-discriminatory and anti-racist. Staff should understand and be sensitive to factors, including economic and social circumstances, ethnicity and disability, which can impact pupils and families' lives.

D Scope

This policy applies to all pupils in the school, including those in the Early Years.

This policy applies to all pupils, living in any circumstances, including at home with their birth parents or other family members, in kinship arrangements including private fostering, special guardianship, children who are adopted and 'looked after children' who may live with foster carers or in residential settings.

It applies to all adults in the school, including in the Early Years: teaching, non-teaching, trainee teachers, pastoral, support, peripatetic, contract staff and ancillary staff, agency/supply staff, volunteers, non-school based Cognita staff and any other adults working at the school. All references in this document to "staff" or "members of staff" should be interpreted as relating to the aforementioned, unless otherwise stated.

This policy applies to all pupils and staff when on the school site, and when the pupils are being educated off-site and/or undertaking an educational visit. It also applies to pupils who are on an exchange and being hosted by the school.

This policy also applies to all third parties who run activities in school on behalf of the school.

E Definitions and Terminology

Definition of safeguarding

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

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment (abuse, neglect and/or exploitation); whether that is within/outside the home or online
- preventing impairment of children's physical and/or mental health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes*

  - Outcome 1: Children, young people and families stay together and get the help they need
  - Outcome 2: Children and young people are safe in and outside their homes
  - Outcome 3: Children and young people are supported by their family network**
  - Outcome 4: Children in care and care leavers have stable, loving homes

*As set out in the Children's Social Care National Framework (2026)

**A family network can be a blood-relative, or a non-related connected person, such as a family friend or neighbour.

Definition of child protection

Child protection is *part* of the safeguarding process and is defined for the purpose of this policy as activity that is undertaken to protect specific children who are suspected of suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including foster care and residential care, as well as online.

Definition of a child

A child is an individual who is under 18 years old.

The word 'child (ren)' is used throughout this policy to mean all children, whilst the word 'pupils' is used when referring to children who attend our school.

Terminology

'RSL' refers to the Cognita Regional Safeguarding Lead (Europe and USA)

'DSL' refers to the school's named Designated Safeguarding Lead

'DDSL' refers to the school's named Deputy Designated Safeguarding Lead

'LADO' refers to the local authority Designated Officer

'DE' refers to the Cognita Director of Education (Europe and USA)

'MD' refers to the Cognita Managing Director of the school

'HoHR' refers to the Cognita Head of Human Resources

'ERM' refers to the Cognita Employee Relations Manager (UK)

'CSO' refers to the Cognita Chief Schools Officer (West)

'ECMS' refers to an Electronic Case Management System used for safeguarding recording

'Cause for Concern' refers to the ECMS input where a staff member records a concern about a pupil

F Key Contacts

School contacts	
Designated Safeguarding Lead (DSL)	Louise O'Reilly (maternity cover for Julia Shenolikar) Tushi Gorasia
Deputy Designated Safeguarding Leads (DDSLs)	Casey Jones
Any other staff trained to DSL level	Tushi Gorasia - Headteacher
Designated Practitioner with responsibility for safeguarding in early years (where appropriate)	Catherine Rosen
Inclusivity Champion	Tushi Gorasia
Senior Attendance Champion	Jamie Kavanagh
Designated Lead for Children not Cared for by their parents	Catherine Rosen
Mental Health and Emotional Wellbeing Lead	Tushi Gorasia (adults) Laura Annon (students)
Headteacher	Tushi Gorasia

Cognita contacts	
Regional Safeguarding Lead (Europe and USA)	Alison Barnett alison.barnett@cognita.com
Regional Director of Education (Europe and USA)	Sarah Reynolds sarah.reynolds@cognita.com
Managing Director (Governance oversight, including Safeguarding)	James Carroll James.carroll@cognita.com

Chief Schools Officer (West)	Germa Rigau Rodriguez germa.rigau@cognita.com
Cognita (proprietor) board member for safeguarding and Group Chief Education Officer	Dr Simon Camby simon.camby@cognita.com
Group Legal Counsel	Jayne Pinchbeck jayne.pinchbeck@cognita.com
Whistleblowing Officer	Jamie Delaney whistleblowingofficer@cognita.com

Note: The Cognita Regional Safeguarding Lead (RSL) (Europe and USA) is a role which supports the development of effective safeguarding practice within the Cognita family of schools and is not intended to replace, in any way, the statutory referral and reporting requirements.

Local Authority Contacts	
Our school follows the safeguarding protocols and procedures of our Safeguarding Partners	City & Hackney Children's Safeguarding Partnership
The local authority Children's Services	City and Hackney https://chscp.org.uk/child-protection-procedures/
The local authority Children's Social Care referral team	Hackney 0208 356 5500 City 0207 332 3621 Out of hours number - 0208 356 2710
The local authority Targeted Early Help and/or Family Help team	**Phone:** 020 7332 3621 (Monday to Friday, 9:00 AM – 5:00 PM) **Email:** children.duty@cityoflondon.gov.uk **Emergency Out-of-Hours:** 020 8356 2710 (Weekends, bank holidays, and 5:00 PM – 9:00 AM
The local authority Designated Officer for child protection (LADO)	Laura Demetriades LADO@cityoflondon.gov.uk 020 7332 1215 / 07795 090649
The local authority Prevent Lead/Officer	**Valeria Cadena (Prevent Lead):** 020 7332 1272 / Valeria.cadena@cityoflondon.gov.uk
The Regional CONTEST Co-Ordinator	London Regional Prevent/CONTEST education coordinator is Jennie Fisher. Email - jennie.fisher@education.gov.uk phone at 07880 469 588

Police	
Police emergency	999
Local police non-emergency	Bishopsgate Police Station 020 7601 2222 or 101

Location of safeguarding and child protection documents in school	
List the documents – from statutory/ external agencies and school documents	Staff Room & DSL Office

UK National Contacts for across the region	
NSPCC 24/7 Helpline	Tel: 0808 800 5000 Email: help@nspcc.org.uk
NSPCC Text line	88858
NSPCC Child Line	Tel: 0800 1111
NSPCC FGM helpline	Tel: 0800 028 3550 Email: fMDhelp@nspcc.org.uk
NSPCC Whistleblowing helpline	Tel: 0800 028 0285 (8am – 8pm) Email: help@nspcc.org.uk
DfE Prevent helpline for schools & parents	Tel: 020 7340 7264 (non-emergency) Email: counter.extremism@education.gsi.gov.uk
The Lucy Faithfull Foundation (LFF)	Tel: 0800 1000 900 Email: help@stopitnow.org.uk www.parentsprotect.co.uk
National Bullying Helpline	Tel: 0845 22 55 787
UK Safer Internet Centre helpline for School Staff	Tel: 0844 381 4772 Email: helpline@saferinternet.org.uk
Internet Watch Foundation hotline for reporting criminal content	www.iwf.org.uk
Educate Against Hate	http://educateagainsthate.com

G Roles and Responsibilities

This section will outline the following:

A. Safeguarding is everyone's responsibility
B. Specific safeguarding roles in our school
C. The Proprietor's role and responsibilities

A Safeguarding is everyone's responsibility

In our school, safeguarding is everyone's responsibility. No single person can have a full picture of a pupil's needs and circumstances. If pupils and their families are to receive the right help at the

right time, everyone who encounters them has a role to play in identifying concerns, sharing information, and taking prompt action.

To fulfil this responsibility effectively, all staff should make sure their approach is child centered within a whole family focus. This means that they should consider, always, what is in the best interests of the child, whilst considering the needs of all parties.

All staff have the following responsibility to:

- Read and understand this policy including all knowledge base documents
- Contribute to providing a safe environment in which all pupils can learn and flourish
- Be aware that pupils may not feel ready or know how to tell someone that they are being abused, exploited, and/or neglected, and/or they may not recognise their experiences as harmful
- Know what to do if a pupil tells them that they are being abused, neglected, and/or exploited and/or if they are experiencing Problematic Sexual Behaviour, Harmful Sexual Behaviour, Sexual Harassment, and/or Sexual Violence
- Know what to do if they are concerned about the behaviour or conduct of staff/adult in the school
- Manage the requirement to maintain an appropriate level of confidentiality
- Know about Online Safety (including the filtering and monitoring systems that are in use)
- Refer any safeguarding concern about pupils to the DSL or the Deputy DSL
- Refer any safeguarding concern about staff to the Headteacher/Principal, or in their absence the Regional Safeguarding Lead/Head of HR/Managing Director
- Refer any safeguarding concern about the Headteacher/Principal to the Head of HR/Regional Safeguarding Lead/ Managing Director
- Be aware of, and know the process for making a referral to the local Universal, Community Based Early Help, Targeted Early Help and Family Help and their role in it; and identify pupils who may benefit from each level of service
- Be aware of the process for making a referral to local authority children's Social Care and understand the role they might be expected to play in statutory assessments
- Be aware of the process of making a referral to the Police and understand the role they may be expected to play in any criminal investigation
- Be aware of the process of making a referral to Prevent and understand the role they may be expected to play in any enquiries

B. Specific safeguarding roles in the school

Designated Safeguarding Lead

The Designated Safeguarding Lead (DSL) is the senior member of staff responsible for leading safeguarding in the school. The DSL must be a member of the school leadership team (SLT) and have the skills, experience, status and authority that is required for this role. The DSL takes the

lead responsibility for safeguarding and child protection in the school (including online safety within which there is filtering and monitoring) and their role description explicitly reflects this.

Deputy Designated Safeguarding Lead

The school can appoint any number of Deputy DSLs. Their role is to support the DSL in their safeguarding role. Whilst the activities of the DSL can be delegated to DDSLs, the ultimate lead responsibility for child protection must remain with the DSL, and this lead responsibility must not be delegated. The Deputy DSLs are trained to the same level as the DSL and their duties of the Deputy DSLs are reflected explicitly in their role descriptions.

Support for the DSL

The DSL role carries a significant level of responsibility, and they must be given the time, funding, training, resources, and support needed to carry out their role. They are required to provide advice and support to other staff on child welfare and child protection matters, to take part in Strategy Discussions and any other inter-agency meetings (see WTSC 2026 Chapter 3), and/or to support other staff to do so, and to contribute to the assessment of pupils.

There are 4 key elements to the DSL role:

1. Manage referrals to external agencies
2. Work with others in other agencies, including the Safeguarding Partners
3. Training, knowledge and skills
4. Raise awareness of safeguarding within the school staff group

1 Manage referrals

The DSL is expected to:

- know and understand their multi agency safeguarding arrangements and the threshold for which all services can be obtained in their local authority (found in the Threshold Document published by the Safeguarding Partners)
- refer cases of suspected abuse to the local authority children's Social Care as required
- know the processes, thresholds for service, and refer cases where required to Universal, Community Based Early Help, Targeted Early Help and Family Help
- support staff who make referrals to local authority children's Social Care and the above services
- refer cases to the Channel programme where there is a radicalisation concern as required, in collaboration with the school Prevent Lead and/or support staff who make referrals to the Channel programme
- refer cases where a staff member is dismissed or has left due to risk/harm to a child to the Disclosure and Barring Service as required (in collaboration with HR team who will lead)
- refer cases where a crime may have been committed or likely to be committed to the Police as required
- refer pupils to external mental health agencies/signpost parents to organisations/professionals when there are concerns about a pupil's emotional wellbeing and/or mental health, in collaboration with the school Wellbeing/Mental Health Lead (s)

- follow up and escalate referrals as needed if not satisfied with the agency response, plus make re-referrals if the pupil's situation does not improve despite intervention/lack of parental engagement

2 Work with others

The DSL is expected to:

- act as a point of contact with the three Safeguarding Partners*
- liaise with the Headteacher/Principal to inform them of safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and Police investigations
- as required, be, or liaise with the "Case Manager" (in relation to allegations against adults) and the LADO at the local authority for child protection concerns in cases which concern a staff member (see below - Allegations)
- liaise with staff (especially pastoral support staff, Wellbeing/Mental Health Lead (s), school nurses, IT technicians, and SENCOs) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies
- act as a source of support, advice and expertise for all staff
- promote supportive engagement with parents and/or carers in safeguarding and the welfare of pupils, including where families may be facing challenging circumstances
- be the Lead Practitioner, as needed, within the Targeted Early Help and Family Help tier of service, which may now include statutory Children in Need (s17 Children Act 1989)

*A statutory Safeguarding Partner in relation to a local authority area in England is defined under the Children Act 2004 (as amended by the Children and Social Work Act, 2017) as:

(a) the local authority

(b) an integrated care board for an area any part of which falls within the local authority area

(c) the chief officer of Police for an area any part of which falls within the local authority area

Note: Education (the school) is known as a 'relevant agency'.

3 Training

Please also see Section H for training requirements.

The DSL (and any deputies) must undergo training to provide them with the knowledge and skills required to carry out their role, including multi-agency working in relation to the MASAs (see below).

This training must be updated **at least every two years**.

Where available, DSLs and DDSLs should access this training via their Local Authority/Safeguarding Partners in order to make local links and understand local processes,

including MASAs and thresholds. Where this is not available, the DSL/DDSL will liaise with the RSL to identify alternative suitable training to the same level; this may be in person /online training.

The DSL and Prevent Lead must undertake the government Prevent awareness training sessions. This is in addition to the Preventing Radicalisation Awareness training that all school staff undertake every 3 years.

The DSL must undertake Online Safety training on an annual and ongoing basis. This will likely be the same training offered to all pupil-facing staff created centrally, but also comprise any additional training that they identify.

The DSL must undertake Safer Recruitment training every 2 years (see Safer Recruitment Policy).

In addition to the formal training set out above, the DSLs knowledge and skills should be refreshed via informal updates (this might be via e-bulletins, meeting other DSLs off/online, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for local authority children's Universal, Community Based Early Help, Targeted Early Help and Family Help processes and Social Care referral arrangements, MASAs, and Threshold Documents published by the Safeguarding Partners
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- ensure each member of staff has access to, and understands, this policy, especially new, part-time staff, trainee teachers, and/or agency staff
- are alert to the specific needs of those pupils who are subject to a statutory child in need plan, those subject to child protection plans, those who are 'looked after' or who have been 'previously looked after' or care leavers, plus those with additional special educational needs, health/medical conditions and young carers
- learn how to maintain high aspirations for vulnerable pupils, promoting their educational outcomes by knowing the welfare, safeguarding and child protection issues experienced by them and the potential impact on their attendance, engagement and achievement
- understand how to support teaching staff to feel confident providing additional academic support/reasonable adjustments for vulnerable pupils who need or have needed a Social Worker, recognising the lasting impact on educational outcomes, even when statutory agencies have ceased involvement
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018, Data (Use and Access) Act 2025, and the UK General Data Protection Regulation (2026)
- understand the importance of information sharing, both within the school, and with the three Safeguarding Partners, other agencies, organisations, and practitioners

- are able to keep detailed, accurate, secure written records of concerns and referrals
- understand and support the school, in collaboration with the school Prevent Lead, with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting pupils from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep pupils safe whilst they are online at school, including knowledge of the school's filtering and monitoring systems and processes
- can recognise the additional risks that pupils with SEN and disabilities (SEND) face online, for example, but not limited to, from online bullying, grooming, exploitation, and radicalisation, and are confident they have the capability to support pupils with SEND to stay safe online
- can recognise the additional risks that pupils who are LGBTQ+ (or perceived to be by others) and/or are questioning their gender (or perceived to be by others) face online, for example, but not limited to, from online bullying, grooming, exploitation, and radicalisation, and are confident they have the capability to support these pupils to stay safe online
- have oversight of attendance, including those pupils who have unexplained absence, are persistently absent from education, potentially missing education, moving to be home educated, and/ or on a sponsored visa
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage and promote a culture of listening to pupils, having an understanding their views and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

4 Raise awareness

The DSL should:

- ensure that the school's Safeguarding and Child Protection policy is known, understood, and used appropriately by staff
- ensure the school's Safeguarding and Child Protection Policy is reviewed annually (as a minimum) after the central review, the procedures and implementation are updated and reviewed regularly, and work with the proprietor/RSL regarding this
- ensure the Safeguarding and Child Protection Policy is available publicly and parents/carers are aware of the fact that referrals to children's Social Care or the Police about suspected abuse or neglect and/or exploitation may be made and the role of the school in this
- ensure that online safety training is provided as part of regular staff updates, including updating them around the school's filtering and monitoring systems and processes
- link with the local Safeguarding Partners to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements, including Universal, Community Based Early Help, Targeted Early Help and Family Help processes, MASAs, and thresholds for service

- help promote and monitor educational outcomes of vulnerable pupils by sharing the information about the welfare, safeguarding and child protection issues that these pupils, including those with a Social Worker, are experiencing, or have experienced, with teachers and school leadership staff
- ensure that the school, and their staff, know who vulnerable pupils are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that pupils in this group might face and the additional academic support and adjustments that they could make to best support them.

Availability

During term time the DSL (or a deputy) will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst generally speaking the DSL (or deputy) will normally be available in person, the Headteacher/Principal will define what "available" means and whether in exceptional circumstances availability via work phone and/or Microsoft Teams. It is the responsibility of the Headteacher/Principal and DSL to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

To ensure continuity of safeguarding responsibilities, schools must have robust cover arrangements in place for periods when the DSL is unavailable due to illness, leave or other circumstances. In these instances the Headteacher will ensure a named DSL 'cover'/

The school can also gain support and advice from the RSL (and/or Social Care /Police as needed). There will be no delay in responding to concerns about pupils.

C The Proprietor's role and responsibilities

Cognita is the proprietor of the school.

As proprietor, Cognita will comply with all duties under legislation and will always take into account statutory guidance, ensuring that all policies, procedures and training are effective and comply with the law at the time.

It is the responsibility of the proprietor to:

- Ensure that all staff having contact with pupils read **at least** Part One of KCSIE plus Annex A
- Ensure that all staff working in the school but not necessarily having direct contact with pupils read Part One of KCSIE
- Ensure that all staff follow the requirements of this Safeguarding and Child Protection Policy
- Ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018, Data (Use and Access) Act 2025, and the UK GDPR (2026)

- Ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities, as set out in Part One of KCSIE
- Designate a senior board member to take leadership responsibility for safeguarding arrangements
- Ensure that all safeguarding arrangements take into account, and work in line with the procedures and practice of the local authority as part of the Multi-Agency Safeguarding Arrangements (MASAs) set up by the Safeguarding Partners (see below).
- Ensure that appropriate policies and procedures are in place in order for appropriate action to be taken in a timely manner to safeguard and promote pupil's welfare
- Ensure that the Safeguarding and Child Protection Policy is updated annually and made available via the school website
- Ensure that the school has a Staff Code of Conduct, Behaviour, Safer Recruitment and IT Policy
- Ensure that all responsibilities are followed regarding Children Absent from Education and Missing Education, using the Children Missing Education Statutory guidance (2025)) and Working Together to Improve Attendance (2024); this includes using the appropriate coding
- Ensure that all schools follow the principles of the Prevent Duty, including the requirement to undertake an annual risk assessment
- Instruct schools to hold more than one emergency contact number for each pupil (and advise that these are reviewed regularly by schools)
- Ensure that schools hold names addresses, and telephone contacts for all those who have Parental Responsibility for a pupil on roll
- Ensure that schools report to their local authority the removal of a pupil from the school roll in line with statutory and local authority guidance, including mid-year and those moving to be home educated
- Ensure that all schools monitor the attendance of all pupils, paying attention to those that have unexplained, persistent and/or prolonged absence; go missing from education; and/or those on sponsored visas (reporting any changes as per policy to the UKVI department)
- Ensure that all staff undergo safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction – this must be in line with advice from the local Safeguarding Partners, the requirements of KCSIE, and the internal Cognita Training Matrix
- Recognise the expertise staff build by undertaking safeguarding training and managing concerns on a daily basis
- Ensure that appropriate filters and monitoring systems are in place to keep pupils safe online and that the DfE filtering and monitoring standards are met; and consider the number of and age range of their pupils, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks. The effectiveness of these filtering and monitoring systems will be reviewed annually and a record made.

- Ensure that they have the appropriate level of cyber-security protection procedures in place in order to safeguard their systems, staff and pupils, and review the effectiveness of these procedures annually to keep up with evolving cyber-crime technologies, and record these checks
- Ensure that pupils are taught about safeguarding, including online safety

The proprietor ensures than an annual review of safeguarding arrangements is conducted. This includes a written report which is presented to the Cognita Board.

H Training Requirements

Training enables staff to fulfil their duty to safeguard pupils. All staff must be aware of the systems within the school which support safeguarding. All training requirements are according to the most recent Cognita Training Matrix (internal document).

Mandatory training

Induction

Prior to any contact with pupils, all new staff (including those with governance oversight and trainee teachers) must be given a mandatory induction, which includes familiarisation with child protection responsibilities and the procedures/systems to be followed if anyone has any concerns about a pupil's safety or welfare.

As part of their induction, **all** new school employed staff (including those with governance oversight and trainee teachers) must be provided with and have read:

- KCSIE – at least Part One (those directly working with pupils) plus Annex A
- KCSIE – Part One (those who do not work directly with pupils)
- Online Safety (which, amongst other things, includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring)
- This Safeguarding and Child Protection Policy
- Code of Conduct (including staff/pupil relationships and communications)
- IT Policy
- Group AI Policy
- Social Media Policy
- Children Absent from Education, Children Missing Education, and Attendance Policy
- Anti-Bullying Policy
- Behaviour Policy
- Preventing Extremism and Radicalisation Policy
- Use of Reasonable Force, Restrictive Intervention and/or Restraint Policy (incorporating searching, screening and confiscation)

New staff must be informed of the names and roles of the DSL, DDSLs, and the RSL.

They should also be informed of the names of their school MD, Head of HR, ERM, DE, and CSO.

All new staff including trainee teachers, plus peri/agency/supply staff must be made aware that they are **not to ever use** their personal mobile phone/other personal devices when on the school site where pupils are present, and that they are required to wear the relevant coloured lanyard for staff at all times when on the school site.

Annual Safeguarding Refresher

All staff employed in school must receive face to face annual safeguarding and child protection training from the DSL via the Safeguarding Refresher presentation (created centrally by the RSL), usually at the commencement of the academic year, in addition to any other presentation/information that the DSL has prepared for the school. This is also made available to those in governance roles.

Basic Safeguarding Children training

All staff employed in school must complete their online basic Safeguarding Children awareness training when they newly start work in the school as part of their induction. This must be updated every three years or less.

NB: DSLs, DDSLs, and Headteacher/Principals are not required to undertake the above Basic level training as they complete DSL/Advanced level training respectively (see below). Agency/Supply/Peripatetic teaching staff must show evidence of Basic Safeguarding training undertaken within 3 years, prior to attending the school for the first time, and must receive a Safeguarding Induction prior to first contact with pupils.

DSLs and DDSLs

(see above section G)

DSLs and DDSL must undertake DSL level training a minimum of every 2 years. This will ideally be via their local authority but if this is not available, the online equivalent approved by the RSL.

In addition to the formal training set out above, the DSLs knowledge and skills should be refreshed via informal updates (this might be via e-bulletins, meeting other DSLs off/online, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

CSO, MD, DE, Executive Headteacher/Principals, Headteacher/Principals, Principals, and Heads of School

Those in the above roles must complete Advanced Safeguarding training similar to the level of the DSLs every 3 years (this is currently created and delivered by the RSL in person/online).

They must also complete Prevent training via the government online sessions (see Preventing Radicalisation Policy), online FGM training every 5 years, annual Online Safety training, and annual Cyber Security training.

MDs must know and understand the MASAs of the school (see below).

Suicide Awareness and Prevention

Those in safeguarding roles must undertake the above training as per the internal Training Matrix every 3 years. Any other staff who wish to undertake this training should contact the RSL to gain access.

Harmful Sexual Behaviours

Those in safeguarding roles must undertake the above training as per the Training Matrix every 3 years. Any other staff who wish to undertake this training may do so with their Headteacher/Principal's authorisation.

Safer Recruitment

The CSO, MD, DE, Executive Headteacher/Principals, Headteacher/Principals, Principals, Heads of School, DSLs and any other staff member directly involved in recruitment, must undertake training every 2 years (see Safer Recruitment Policy).

Preventing Radicalisation

All school employed staff must complete online Prevent training every 3 years.

The Preventing Radicalisation Lead and DSL (only, although any staff member can access) must complete additional Prevent training via the government online sessions (see Preventing Radicalisation Policy).

Female Genital Mutilation

All school employed staff who have contact with pupils must complete online FGM training every 5 years.

Looked After Children (including Previously Looked After and Care Leavers).

The Designated Teacher for Looked After Children for the school will undertake training every 3 years; this is currently centrally arranged through TES by the RSL. It is best practice that the DSL also undertakes this training.

Online Safety

All staff who have direct contact with pupils must complete the Online Safety training.

This training is centrally created by the RSL and self-served by the DSL/DDSL in school.

Cyber security training

All staff in the school must complete annual cyber security training, as must those in governance roles. This will be as per the internal Training Matrix, but additional training can be found below.

ncsc.gov.uk/information/cyber-security-training schools.

Non-Mandatory training

Updates and CPD

All staff will also receive 'drip drip' bitesize safeguarding and child protection updates/training, including online safety training, regularly *throughout the year*. This is created and cascaded by the RSL, DSL, DDSL and/or external specialist. This will ensure that all staff have the relevant skills and knowledge to safeguard pupils effectively. The topics covered may include information related to knowledge base documents. Format and content of any resources/presentations/training sessions can be decided by the school safeguarding team.

Many additional non-mandatory CPD training sessions have been created by the RSL ready for DSLs to self-serve in school as required.

Drug and Alcohol Awareness (need-led assessment).

This training is created and/or arranged by the RSL. It should be updated every 3 years.

Mental Health Awareness (Children) (need-led assessment).

This training is created and/or arranged by the RSL. It should be updated every 3 years.

Those in mental health or wellbeing roles within the school should have additional training- advised by the RSL on request.

Understanding Safeguarding Practice for Early Years Staff

EYDSL s and EYDDLs must undertake the above training for their roles, but may also complete the above, as per the internal Training Matrix.

Third-party contractors

It is good practice for those employed as third-party contractors who work regularly in school with the opportunity for contact with pupils to have Basic Safeguarding training, at a level appropriate to their role. This training should be arranged by their employers not the school.

I Information Sharing and Data Protection

This policy adheres to the principles and advice in the UK government guidance Information Sharing for Practitioners (2024). Note: this guidance is currently being updated.

Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. Information sharing is vital in identifying and tackling all forms of abuse, neglect, and/or exploitation. No single person can have a full picture of a child's needs and circumstances, so effective and proactive sharing of information between schools, local organisations and agencies is essential for early identification of need, assessment,

and service provision to keep children safe. Staff must not assume that someone else will pass on information that they think may be critical to keep a pupil safe.

The Data Protection Act (2018), Data (Use and Access) Act 2025, and GDPR (2026) do not prevent the sharing of information for the purposes of keeping children safe and promoting the child's welfare. 'Safeguarding of children and individuals at risk' is a processing condition that allows schools to share sensitive and personal information which is treated as 'special category personal data'. This includes allowing schools to share information with external agencies without parental consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of the pupil, in a timely manner. It would be legitimate to share information without consent where: it is not possible to gain consent; it cannot be reasonably expected that a safeguarding practitioner gains consent; and, if to gain consent, would place a pupil at risk. School staff should, therefore, be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of pupils, whether this is when problems are first emerging and/or a pattern is developing (for example, persistent school absences, going missing, or receiving unexplained gifts or new possessions), or where a pupil is already known to the local authority children's Social Care. Sharing information about any adults with whom that pupil has contact, which may impact on the pupil's safety or welfare, is also critical.

When deciding what information to share, schools should consider:

- • the relevancy of the information, including to the current safeguarding risk
- • what is necessary for the receiving setting to know, and
- • whether it is clearly presented and appropriately contextualised.

Professional judgement should be used to ensure that the information shared is focused and proportionate. This may include summarising or omitting information which is not necessary for safeguarding purposes. However, care should be taken not to omit information where it may be relevant to understanding or managing safeguarding risk. This is further supported by the new government Information Sharing Duty (pending), which is intended to give staff greater confidence to share information appropriately and in a timely way to safeguard children.

Schools should be particularly alert to the importance of sharing information when a pupil moves from one local authority into another, due to the risk that knowledge pertinent to keeping a child safe could be lost. Should a pupil be open to Social Care in the authority in which they reside, but moves permanently to another local authority area, the original local authority should ensure that all relevant information is shared with the receiving local authority as soon as possible. The school should liaise, as required, with both authorities until the handover has been completed.

Further details on information sharing can be found in:

Information Sharing Advice for Safeguarding Practitioners (2024). Please note that this guidance is currently being updated.

Working Together to Safeguard Children, which includes a myth-busting guide to information sharing

Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers, the seven golden rules for sharing information will be especially useful

The Information Commissioner's Office (ICO) guide to sharing information to safeguard children and young people in the education sector in the UK which is intended to help practitioners to feel confident to share personal information for safeguarding purposes

Data protection: toolkit for schools - Guidance to support schools with data protection activity, including compliance with the UK GDPR.

J Policy Review

This policy is updated annually by the school, after first being centrally reviewed by the RSL. Those in governance roles have oversight and consult with the RSL.

Updates to the policy also draw on feedback from safeguarding staff in schools across the region and are also informed by any shared learning from the region/other regions.

Changes will also reflect any new government guidance, regulations, or legislation.

The policy is then shared with all staff through the annual safeguarding declaration process, with training provided throughout the year to support and sustain learning and awareness.

K Governance Arrangements

Governance is undertaken on behalf of the Cognita Board (Cognita Holdings Limited). Group-wide arrangements are in place, and the Group Chief Education Officer holds responsibility for these arrangements. The arrangements outline clear lines of accountability and responsibility for all aspects of safeguarding which are executed and reported in the following four ways:

School

Reviews in individual schools by an Independent Safeguarding Reviewer (annual)

Region

Safeguarding data reporting from each school to the regional team (termly)

Regional Safeguarding Assurance Board Meetings (termly)

Group

Regional Annual Safeguarding Report and Annual Safeguarding Governance Meeting

Those with governance oversight should be aware of their obligations under the Human Rights Act 1998 and the Equality Act 2010 (including the Public Sector Equality Duty) and the local multi-agency safeguarding arrangements for the schools they support. They should also be aware of the obligations under the Data Protection Act 2018, Data (Use and Access) Act 2025, and the UK General Data Protection Regulation (UK GDPR) requirements which place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

Human Rights Act 1998

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them. Under the HRA, it is unlawful for schools to act in a way that is incompatible with the Convention. The specific convention rights applying to schools are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination
- Protocol 1, Article 2: protects the right to education.

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Further information (including absolute and qualified rights) can be found at Human Rights | Equality and Human Rights Commission (equalityhumanrights.com).

Equality Act 2010

According to the Equality Act, schools must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics). Whilst all of the above protections are important, in the context of safeguarding, this guidance, and the legal duties placed on schools in relation to safeguarding and promoting the welfare of pupils, those with governance oversight and proprietors should carefully consider how they are supporting their pupils with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.

Provisions within the Equality Act allow schools to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils with a particular protected

characteristic in order to meet their specific need (s), this includes the duty to make reasonable adjustments for disabled pupils, including those with long-term conditions. A school could, for example, consider taking positive action to support a girl if there was evidence that they were being disproportionately subjected to sexual violence or sexual harassment.

Sport

The Equality Act 2010 contains an exception in relation to single-sex sport. It applies to participation in any sport or game, or activity of a competitive nature, where the physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa). This means that schools can separate children according to their biological sex in these circumstances without discriminating unlawfully against them on the basis of their sex.

Some sports may need to be played in single-sex groups from a certain age to ensure children's safety, and where this is the case there should be no exceptions. In other cases, schools may have adopted a policy of single-sex sports for reasons related to fairness.

Where there are no safety concerns and a pupil makes a request relating to how they participate, schools will need to consider the request in light of the advice on "considering requests for support with social transition". This means that the school would need to take into account all the relevant factors, including whether supporting social transition is overall in the best interests of the pupil, as well as considering the impact on other pupils and the aim of creating safe and fair environments for all pupils to participate in PE.

Toilets

Schools must not allow pupils into toilets designated for the opposite biological sex. There must be no exceptions. This includes where schools are responding to a request to support any degree of social transition for pupils who are questioning their gender (see below).

Schools must provide separate toilets for boys and girls aged 8 and over (apart from where individual toilets are in a room that can be locked from the inside, intended for use by one pupil at a time). This is required by the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014 which apply to independent schools and reflects schools' safeguarding obligations.

If a pupil does not want to use the toilet designated for their biological sex, schools should consider whether they can provide an alternative toilet facility, for example self-contained individual toilets, without compromising the provision of single-sex facilities, without compromising the provision of single-sex facilities. These alternative arrangements should not compromise the safety, comfort, privacy or dignity of the pupil, or of other pupils. It is important that schools keep a clear written record of these situations, ensure they are communicated appropriately, and review them regularly.

Where a school provides mixed-sex toilets in addition to single-sex toilets, schools should assess safeguarding risks and plan accordingly, for example, mixed-sex toilets should open directly onto public areas (e.g. a corridor).

Changing Rooms and Showers

Schools must not allow a pupil, aged 11 years or older at the start of the school year, to undress in front of a pupil of the opposite biological sex, to comply with their safeguarding duties. There must be no exceptions. When responding to a request to support any degree of social transition this must not include allowing access to changing rooms designated for the opposite sex.

The School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014 require independent schools to provide suitable changing accommodation and showers for pupils who are aged 11 years or over at the start of the school year. This means that it must be suitable for the pupils it is provided for, having regard to their ages, numbers and sex and any special requirements they may have.

If a pupil does not want to use the changing rooms and showers designated for their biological sex, schools should consider whether they can provide an alternative changing or washing facility, but this must not compromise the provision of single-sex facilities. This could be a fully enclosed room – for use by one pupil at a time that can be secured from the inside – or by allowing access to facilities at an alternative time.

It is important that schools keep a clear written record of these situations, ensure they are communicated appropriately, and review them regularly.

Residential Accommodation

Schools must not allow a pupil to share overnight accommodation with a pupil of the opposite biological sex. There must be no exceptions. Responding to a request to support any degree of social transition must not include allowing access to residential accommodation designed for the opposite sex.

In allocating sleeping arrangements such as dormitories, tents or shared rooms for school trips, schools must have regard to their duties under the Equality Act, their safeguarding obligations, and other relevant regulations and standards, including those related to residential accommodation.

However, if a pupil does not want to share a room with another pupil of the same biological sex, alternative arrangements must be sought where possible. Alternative arrangements should not compromise the safety, comfort, privacy or dignity of any pupil. They might include, for instance, finding a suitable separate room for the pupil.

Where a pupil's concern reflects a request for support with social transition, the school should consider the section within KCSIE on 'considering requests for support for social transition' before making any decisions.

Guidance to help schools understand how the Equality Act affects them and how to fulfil their duties under the act can be found at Equality Act 2010: advice for schools - GOV.UK (www.gov.uk). For further information Equality Act guidance | Equality and Human Rights Commission (equalityhumanrights.com).

See below for children questioning their gender.

Public Sector Equality Duty

The Public Sector Equality Duty (PSED) is found within the Equality Act. The PSED places a general duty on schools to have, in the exercise of their functions, due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those pupils who share a relevant protected characteristic and those who do not. The duty applies to all protected characteristics and means that whenever significant decisions are being made or policies developed, specific consideration must be given to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them such as sexual violence and sexual harassment, misogyny/misandry, racism and faith-based prejudice. This is one reason why good record-keeping and monitoring of all forms of abuse and harassment is essential.

Some pupils may be more at risk of harm or bullying from specific issues such as Problematic Sexual Behaviour (PSB), Harmful Sexual Behaviours (HSB), sexual harassment, sexual violence, homophobic, biphobic or transphobic bullying or faith-or race-based discrimination.

L Legal considerations

Our safeguarding and child protection policies, processes and knowledge base are built upon and support the 1989 international legal framework - the United Nations Convention on the Rights of the Child.

Specific legal context (not limited to)

- Children Act (1989; 2004)
- Children and Social Work Act (2017)
- Children's Wellbeing and Schools Act (2026)
- Crime and Policing Act (2026)
- Sexual Offences Act (2003)
- Domestic Abuse Act (2021)
- Equality Act (2010)
- Police and Criminal Evidence Act (1984)
- Human Rights Act (1998)
- Education Act (2002)
- The Relationships Education, Relationships and Sex Education and Health Education (England) Regulations (2019), made under sections 34 and 35 of the Children and Social Work Act (2017)
- Health and Care Act (2022)
- Online Safety Act (2023)
- Children and Families Act (2014)
- Data Protection Act (2018)
- UK GDPR (2026)
- Data (Use and Access) Act 2025

- Victim and Prisoners Act (2024)

M Related documentation

This policy should also be read in relation to the most recent version of the following documents which underpin this policy and best practice across the region:

National government guidance documents (UK):

- The Education (Independent School Standards) Regulations (2014)
- School Attendance (Pupil Registration) (England) Regulations (2024)
- Independent School Standards Guidance (2026)
- Schools (Recording and Reporting of Seclusion and Restraint) (England) Regulations 2025
- Keeping Children Safe in Education (KCSIE) (2026)
- Working Together to Safeguard Children (2026)
- Working Together to Improve Attendance (2024)
- Prevent Duty Guidance: for England and Wales (2023)
- Safeguarding Learners vulnerable to radicalisation (2023) Disqualification under the Childcare Act (2018)
- What do to if you are worried a child is being abused – Advice for practitioners (2015)
- Early Years Foundation Stage Framework (2026)
- Teachers Standards (2021)
- Behaviour in schools; advice for headteachers and school staff (2024)
- Mobile phones in schools (2026)
- Restrictive Interventions, including the use of reasonable force in schools (2026)
- Schools (Recording and Reporting of Seclusion and Restraint) (No 2) (England) Regulations (2025)
- Gender separation in mixed schools (2018)
- Relationships Education, Relationships and Sex Education (RSE) and Health Education (2025)
- Preventing and Tackling Bullying: advice for Headteachers, staff and governing bodies (2017)

Any references to national guidance made within this document are in relation to the versions listed above. The school will always refer to the above statutory guidance as the benchmark for all safeguarding practice and decision making, whilst adhering to local authority procedures.

Internal Cognita school documents:

- Behaviour Policy
- Anti-Bullying Policy
- Drug and Alcohol Policy
- IT Policy

- Group AI Policy
- Suspension, Exclusion and Required removal in Other Circumstances Policy
- Early Years – Use of Mobile Phones, and Devices Policy
- Preventing Extremism and Radicalisation Policy
- Safer Recruitment Policy
- Staff Code of Conduct
- Use of Reasonable Force, Restrictive Interventions, and/or Restraint, incorporating Screening, Searching, and Confiscation Policy
- Social Media Policy
- Equality, Diversity, and Inclusion Policy
- Children Absent in Education, Children Missing Education, and Attendance Policy
- Child Supervision, Lost, and Missing Policy
- RSHE Policy
- Group Safeguarding Governance and Oversight Policy

N Teaching pupils about safeguarding

More information can be found in our RSE Policy.

The government RSHE guidance can be found here.

The school is committed to proactively teaching pupils about safeguarding, including online safety, as part of our integrated, aligned, and considered whole-school safeguarding approach to offering a broad, balanced and inclusive curriculum. High quality, evidence-based teaching of relationships, sex and health education (RSHE) can help prepare pupils for the opportunities and responsibilities of adult life, and can promote their moral, social, mental and physical development. Effective teaching will support pupils to cultivate positive characteristics including resilience, self-worth, self-respect, honesty, integrity, courage, kindness, and trustworthiness.

The school will sequence teaching so that pupils are supported and equipped with the knowledge to navigate different experiences in a positive way before they occur, and to prevent harms. The aim of teaching about health and wellbeing is to enable pupils to make good decisions about their own health and wellbeing, to understand the links between physical and mental health, to recognise when things are not right in their own health or the health of others, and to seek support when needed. Schools will support pupils to develop strategies for self-regulation, perseverance and determination, even in the face of setbacks.

Our programme is fully inclusive and developed to be age and stage of development appropriate, whilst also considering the needs of pupils with special educational needs and/or disabilities (SEND) and other vulnerabilities, such as being the victim of abuse. Teaching will be developed to ensure these subjects are accessible for pupils with SEND and prepare pupils for adulthood, as set out in the SEND code of practice: 0 to 25 years.

The starting principle will be that applicable law should be taught in a factual way so that pupils are clear about their rights and responsibilities as citizens. Pupils will be taught to understand the importance of equality and respect throughout their education in a way that is appropriate for their

age and stage of development, whilst aligning with the government guidance. Teaching staff will not seek to convince pupils that a particular position on a topic is necessarily correct, or try to impose their own views on pupils.

The school will be sensitive to pupils' circumstances, recognising that families of many forms provide a nurturing environment for children, and can include single parent families, same-sex parents, families headed by grandparents, young carers, kinship carers, adoptive parents and foster parents/carers. Our teaching will illustrate a wide range of family structures in a positive way, and care will be taken to ensure that pupils are not stigmatised based on their home circumstances.

Pupils will learn about all protected characteristics, including the facts and the law about biological sex and gender reassignment. This will help them understand and recognise that people have legal rights by virtue of their biological sex which are different from the rights of those of the opposite sex with the protected characteristic of gender reassignment. Pupils will also be taught to recognise that people with the protected characteristic of gender reassignment, as with the other protected characteristics, have protection from discrimination and should be treated with respect and dignity.

In teaching this, schools should be mindful that beyond the facts and the law about biological sex and gender reassignment there is significant debate, and staff must be careful not to endorse any particular view or teach it as fact. For example, staff will not teach as fact that all people have a gender identity. Staff will avoid language and activities which repeat or enforce gender stereotypes, and be mindful to avoid any suggestion to pupils that social transition is a simple solution to feelings of distress or discomfort.

Effective teaching will support prevention of harms by helping pupils understand and identify when things are not right. In our school, we have a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, PSB, HSB and sexual violence/harassment, derogatory behaviour, or other forms of physical violence and conflict. The school will focus on building positive attitudes and skills, promoting healthy norms about relationships, including sexual relationships where relevant, and about health, including mental health. The school will avoid language which might normalise harmful behaviour among pupils – for example gendered language which might normalise male violence or stigmatise boys.

Teaching will be sensitive to the religious background of pupils, and schools must ensure they comply with the relevant provisions of the Equality Act 2010, under which religion or belief are amongst the protected characteristics.

Pupils will be introduced to protective and preventative content in a way that does not cause unreasonable alarm and does not appear to normalise risky behaviours or activities. Teaching will be age appropriate and respectful of all pupils, including those who may have no familiarity with the topics under discussion. When teaching sensitive topics, teachers will use approaches such as distancing techniques, setting ground rules with the class to help manage sensitive discussion, and using question boxes to allow pupils to raise issues anonymously.

Staff will be aware that discussions about sensitive topics in these lessons may lead to increased safeguarding reports. For example, pupils may ask questions about topics which go beyond any sex education covered by the school or relate to sex education from which they have been

withdrawn. In handling these situations, the emphasis will always be on supporting the pupil, recognising that those whose questions go unanswered might instead turn to inappropriate sources of information, including online. Support offered by staff may include speaking to them about their question following the session, asking a them to speak to their parents/carers, or gaining support from the DSL/DDSL. Any safeguarding concerns arising from something that a pupil has said/asked will be managed according to this policy. Pupils should also understand where they can report any concerns and seek help, including to external services if they do not feel comfortable talking to school staff.

Where staff decide to use external resources, they will avoid materials that use cartoons or diagrams that oversimplify this topic, that could be interpreted as being aimed at younger children, or that perpetuate stereotypes or encourage pupils to question their gender. The school will consult parents/carers on the content of external resources on this topic in advance and make all materials available to them on request.

Where copyright law applies, schools must comply with it when sharing resources with parents. It is best practice to share materials via a “parent portal” or, if this is not possible, through a presentation. When schools make documents available to parents, they should acknowledge the provider’s authorship. They should include a statement, that parents agree to as a condition of access that the content should not be copied or shared further except as authorised under copyright law. Where relevant and possible, IT systems should also be in place to prevent downloading.

Relationships education compulsory for all pupils receiving primary education and relationships and sex education (RSE) compulsory for all pupils receiving secondary education. Personal, social, health and economic education (PSHE) continue to be compulsory in independent schools.

The safeguarding curriculum is taught across the school in the following way: At Charterhouse Square School, PSHE education is the curriculum subject that gives children the knowledge, understanding, attitudes and practical skills to live safe, healthy, productive lives and meet their full potential. The school deliver this approach using the Jigsaw PSHE scheme of learning

Our RSE is taught as part of our Jigsaw PSHE curriculum, through a unit called ‘Changing Me’. The PSHE course is delivered to all students through discrete, weekly PSHE lessons taught by class teachers to ensure a sensitive and individualised approach from a familiar and trusted member of staff.
Elements of the programme may be supported through the bringing in of additional expertise, such as outside speakers, trained health professionals (the credentials of any visitor or visiting organisation, and their materials will be checked prior to booking). The school will not use resources from any individual or organisation who hold partisan views on contested topics. External providers may not include contractual restrictions preventing schools from sharing materials with parents

We also draw upon the use of teachers with a particular interest or knowledge in a specific area. In addition to these discrete sessions, PSHE is also embedded within the curriculum (e.g., social

issues through the teaching of English Literature; Health through Biology and PE; Citizenship through History & RE). There are also centrally organised sessions which supplement the delivery in house.

Relationships education is compulsory in all primary schools.
Relationships education focuses on teaching the fundamental building blocks and characteristics of positive relationships, including:

- Families and people who care for me
- Caring friendships
- Respectful kind relationships
- Online safety and awareness
- Being safe

Parents/Carers

The school will proactively engage parents/carers and make sure they are aware of what is being taught to pupils in RSHE, and consult with them when developing content and when reviewing the RSHE Policy: retaining evidence of this consultation. The school will show parents/carers a representative sample of the resources that they plan to use, enabling parents/carers to continue conversations started in class, and should ensure that parents/carers are able to view all curriculum materials used to teach RSHE on request. Other steps may include inviting parents/carers into school to discuss the curriculum content and the importance of RSHE for wellbeing and safety, inviting them to discuss any concerns, and supporting parents/carers in managing conversations with their child (ren) about RSHE topics.

When contracting with external providers, the school will not agree to any contractual restrictions on showing parents/carers any content that the school will use. The school will communicate to providers that they are legally obliged to have regard to this statutory guidance, including the expectation that all content can be shared with parents/carers. Where contractual clauses exist that seek to prevent schools sharing any material at all with parents/carers, they are void and unenforceable. This is because they contradict the clear public policy interest of ensuring that parents/carers are aware of what their children are being taught in sex and relationships education. Where copyright law applies, schools must comply with it when sharing resources with parents/carers. It is best practice to share materials via a “parent portal” or, if this is not possible, through a presentation. When schools make documents available to parents/carers, they should acknowledge the provider’s authorship. They should include a statement, that parents/carers agree to as a condition of access, that the content should not be copied or shared further except as authorised under copyright law. Where relevant and possible, IT systems should also be in place to prevent downloading.

Resources

DfE advice for schools: teaching online safety in schools Free, time saving teacher resources: Oak National Academy

UK Council for Internet Safety (UKCIS) guidance: Education for a connected world

UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people

The UKCIS external visitor's guidance helps schools to ensure the maximum impact of any online safety sessions delivered by external visitors

Public Health England: Every Mind Matters

Harmful online challenges and online hoaxes

National Crime Agency's CEOP Education Programme: Protecting children and young people from online child sexual abuse through education. Including PSHE Association accredited lesson plans and resources aligned to the RSHE curriculum, regular e-bulletins on new and emerging threats and training for professionals on online child sexual abuse.

O Online Safety

Introduction

Technology often provides the platform that may facilitate harm. All staff should be aware of the unique risks to pupils associated with online safety, and that technology is a significant component in many safeguarding and wellbeing issues, for example, the part that online use can play in grooming children and facilitating and/or causing harm. Staff should also be aware that there may be an overlap between online and offline risk of harm.

It is essential that pupils are safeguarded from potentially harmful and inappropriate online material. As such, online safety is a running and interrelated theme within our whole school approach to safeguarding. This empowers the school to protect and educate pupils (and staff) in their use of technology, and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

Whilst some tasks are able to be delegated to other members of the safeguarding team or other interested and knowledgeable staff, DSLs are responsible for overseeing online safety in schools (including understanding the filtering and monitoring systems in place). They must raise awareness for staff, accordingly, including but not limited to, filtering and monitoring systems, cyber-bullying, child sexual/criminal exploitation, radicalisation, sexually coerced exploitation, and sexual predation, including online grooming

Areas of risk

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

1 Content:

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

2 Contact:

being subjected to harmful online interaction with other users or generative AI applications that simulate this, for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

3 Conduct:

online behaviour that increases the likelihood of (or causes) harm for example, making, sending and receiving explicit images e.g. consensual and non-consensual sharing of self- generated intimate imagery and/or videos (also known as sharing nudes/semi-nudes), including those generated using AI e.g. deepfakes, sharing other explicit images, pornography, and online bullying

4 Commercial:

risks such as online gambling, inappropriate advertising, phishing, and or financial scams (including sexually coerced exploitation). If pupils or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/), CEOP and/or the IWF.

Annual Risk assessment

Technology, and risks and harms related to it evolve and changes rapidly.

The school must carry out an annual review of their approach to online safety, supported by an annual risk assessment that considers and reflects the risks their children face (using the 360 safe website OR the LGfL online safety audit).

Filtering and Monitoring

Whilst considering their responsibility to safeguard and promote the welfare of pupils and provide them with a safe environment in which to learn (whatever their age and stage of development), those with governance oversight centrally and at the school will be doing all that they reasonably can to limit pupil's exposure to the above risks from the school's IT system.

As part of this process, the school has appropriate filters and monitoring systems in place, and systems connected to cyber security; these apply to pupils and staff accounts

Led by the Heads of the relevant central departments, these systems are reviewed centrally. These central teams are responsible for ensuring schools have the appropriate level of security protection procedures in place in order to safeguard their systems, staff, and pupils. They must review the effectiveness of these procedures annually (i.e. a minimum of once every academic year) to keep up with evolving terminology and cyber-crime technologies. Checks must be made on all internet connected devices in all relevant locations - a central record is kept of these checks and annual cyber security risk assessment is completed.

In addition to the centrally run checks, reviews, and risk assessments outlined above, the school undertakes internal checks on any alerts that are raised for individual pupils in terms of their online use. Routine checks are made on a weekly basis for all vulnerable pupils plus a selection of random checks are also undertaken.

Should a safeguarding concern be raised in connection with a pupil's online use, the parents/carers will be informed unless to do so would heighten risk to the pupil/other. The concern will be recorded on our main safeguarding system linked to the pupil. Should a safeguarding concern be raised in connection with a staff member's online use, this will be managed internally according to our Low-Level Concerns/Allegations process, in collaboration with the RSL and colleagues in the HR department.

For a full and more detailed description of the school's filtering and monitoring systems, please see our IT Policy. All staff must be familiar with the latter policy.

Those working centrally for Cognita have reviewed and actioned the guidance within the following: Cyber security standards for schools which were developed to help schools improve their resilience against cyber-attacks.

'Plan technology for your school - GOV.UK to self- assess against the filtering and monitoring standards and will make any needed changes, as and when required.

Meeting Digital and Technology Standards in Schools and Colleges (2026) The appropriateness of any filtering and monitoring systems will also be informed in part, by the risk assessment required by the Prevent Duty (see Preventing Radicalisation and Extremism Policy). Generative AI: product safety expectations which supports schools to use generative artificial intelligence safely and explains how filtering and monitoring requirements apply to the use of generative AI in education. For a full and detailed description of our use of AI, please see the AI Policy. Guidance to support schools to understand safety considerations and legal responsibilities if they choose to use Generative AI (either teacher-facing or pupil-facing) can be found at Generative artificial intelligence in education. To complement this, the department, in partnership with the Chiltern Learning Trust and Chartered College of Teaching, have published online resources to help school and college staff to use AI safely and effectively.

Whilst it is essential schools ensure that appropriate filters and monitoring systems are in place, they should be careful that "over blocking" does not lead to unreasonable restrictions as to what pupils can be taught with regard to online teaching and safeguarding. The school will ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in

place and manage them effectively and know how to escalate concerns when identified. All staff should understand their role in preventing, identifying and responding to harm caused by its use.

Many pupils have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means some pupils, whilst at school, may potentially sexually harass their peers via their personal mobile and smart technology, share indecent images, including self/AI generated imagery: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content.

Schools will always work with parents/carers to support them to address their child's online activity as needed

Pupil Mobile Phones:

Please see our Behaviour Policy for more information about pupil mobile phones.

Government guidance: Mobile phones in schools

Staff Personal Devices

All staff are prohibited from having/using any personal device capable of capturing or sharing imagery/videos and/or data **in the presence/close vicinity of pupils whether on/off site**: this includes mobile phones, tablets, any Smart devices (including, but not limited to; phones, watches, glasses, and rings/jewellry), hearables and wearables (small electronic devices designed to be worn on the body, often close to the skin, to monitor and relay information about the wearer or their environment in real time). Wearables also pose risks (other than those related to safeguarding as outlined above) in terms of potential data breaches including 'hacking', unauthorized access, and privacy violations such as surveillance and stalking.

Currently health-related wearables* may potentially be worn, as long as the functionality regarding imagery/videos is disabled whilst the staff member is in school/with pupils off site. Note this position may change with technology advances.

Wearables for medical conditions* will be permitted but must also have the functionality to take imagery/videos disabled.

*Staff using a wearable as outlined above for health reasons /medical conditions must complete a Self-Report (see below) detailing the specific name of the wearable and the reason for requiring it.

Headteachers/Principals **must** confirm in writing (on the SR) that the individual member of staff can use the stated wearable. Permission to wear such a device will be refused if the staff member deviates from the above advice regarding disabling functionality to take imagery/videos.

Cybercrime

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

Cyber-dependent crime continues to represent one of the most significant and rapidly evolving threats within the United Kingdom's (UK) crime landscape. Offences under the Computer Misuse Act 1990 (CMA) have risen substantially.

Young people across the UK experiment with illegal online activity, often without understanding the legal or ethical implications. The impact of cybercrime extends well beyond immediate financial losses, with scope to cause disruption to national infrastructure. Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a pupil in this area, the DSL should consider referring into the **Cyber Choices** programme. This is a nationwide preventative police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests. Note that **Cyber Choices** does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Cyber-dependent crimes include:

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

Pupils

Pupils will be taught about how to keep themselves safe online, including being aware of potential risks within the curriculum in an age-appropriate way. For more information, please see our RSE Policy.

Parents/Carers

The school will use parental communications to reinforce the importance of pupils being safe online. Parents/carers may be supported to understand what systems the school uses to filter and monitor online use. The school will update parents/carers regularly about what their children are being asked to do online in school, including the sites they will be asked to access, and with whom they may be interacting with online.

Resources

More information around teaching online safety, can be found here

Additional information to support schools and parents to keep children safe online (including when they are online at home) is provided in KCSIE (2026) Annx A page 176.

UKCIS has published Online safety in schools and colleges: Questions from the governing board. The questions can be used to gain a basic understanding of the current approach to keeping children safe online; learn how to improve this approach where appropriate; and find out about tools which can be used to improve the approach. It has also published an Online Safety Audit Tool which helps mentors of trainee teachers and newly qualified teachers induct mentees and provide ongoing support, development and monitoring.

When reviewing online safety provision, the UKCIS external visitors guidance highlights a range of resources which can support educational settings to develop a whole school approach towards online safety

Guidance to support schools to understand safety considerations and legal responsibilities if they choose to use Generative AI (either teacher-facing or pupil-facing) can be found at Generative artificial intelligence in education.

The Department has published Generative AI: product safety expectations to support schools to use generative artificial intelligence safely, and explains how filtering and monitoring requirements apply to the use of generative AI in education.

The Chiltern Learning Trust and Chartered College of Teaching have published online resources to help school and college staff to use AI safely and effectively. Module 3 provides important information on identifying and mitigating key risks associated with safeguarding, ethics, data protection, and intellectual property,

UK Safer Internet Centre: https://saferinternet.org.uk/guide-and-resource/teachers-and-school-staff/appropriate-filtering-and-monitoring.

The UK Safer Internet Centre produced a series of webinars for teachers on behalf of the Department. These webinars were designed to inform and support schools with their filtering and monitoring responsibilities and can be assessed at Filtering and monitoring webinars available – UK Safer Internet Centre

UK CMOSs' advice - UK CMO commentary on screen time and social media map of reviews - GOV.UK

P Child's Voice

We actively promote the view that pupils should feel able to raise any concerns that they may have. Through our ongoing work with them, we aim to build resilience so that every pupil knows that we

are a 'telling school' and that speaking up about any concern is valued and actively promoted. This includes raising a concern about themselves or about another peer or adult.

Legal duties under the Equality Act (2010) will be complied with, including putting special provision in place to support dialogue with pupils who may not be able to convey their wishes and feelings as they may want to. This might include, for example, those who have communication difficulties, unaccompanied children, refugees, those pupils who are victims of modern slavery and/or human trafficking and those who do not speak English or for whom English is not their first language.

With regards to consent to share information, and decision making, there is a need to balance the need to listen to pupils' wishes and feelings with the responsibility of keeping them safe and fulfilling statutory duties. The school will be mindful of Gillick competency and Fraser guidelines. The pupils' welfare is paramount.

Please see below for more information in Part 2.

We take the following measures to ensure that pupils know how to raise a concern: Need To Talk Posters, regular signposting to adults we trust, worry boxes in classrooms as well as in corridors.

Q Safer Recruitment

Our school prioritises embedding a culture of safer recruitment as part of our strategy for preventing harm to pupils. Statutory procedures for checking the suitability of staff and volunteers who work with pupils are always followed (see Safer Recruitment Policy).

R Working in partnership with parents/carers

Staff will work in partnership with parents/carers, in all situations other than when to do so may increase risk to a pupil; in these situations, the school will be directed by external statutory agencies. This partnership approach sits within a whole family culture in which the needs of all members of the family are explored as individuals and how their needs impact on one another is drawn out.

Staff will recognise, engage, and work with pupils and parents/carers who may present as unwilling or unable to engage with interventions/advice. It is recognised that engaging safely in some suggested interventions may be more challenging, such as those pupils and parents/carers experiencing abusive behaviour within their own intimate relationships, which may include domestic abuse and/or coercive or controlling behaviour, teenage relationship abuse, and 'honour' abuse including forced marriage and Female Genital Mutilation, or abuse related to faith or belief.

Four principles underpin our work with parents/carers:

1. Effective partnership working with parents and carers happens when school staff build strong, positive, trusting, and co-operative relationships by:

- approaching families and their wider family networks with empathy, respect, compassion, and creativity
- avoiding reinforcing family shame, suffering, and blaming
- using strength-based approaches, working with parents/carers to identify what is working well and how their strengths could support them to effect positive change
- ensuring they work sensitively with parents/carers (and pupils) to identify and understand the impact of adversity and trauma in their lives. They seek to understand how adversity and trauma might manifest and affect pupils and parents' engagement and adapt their response with care and compassion
- adapting their responses to meet the diverse needs of parents/carers, including fathers and male carers, and the specific challenges being faced, including parents/carers of disabled children, and where harm is outside the home (see below)
- ensuring they understand the families' background, ethnicity, religion, financial situation, ability, education, sex, ages and sexual orientation, and potential barriers these create in seeking and accessing help and support
- being alert and recognising where parents/carers may not be acting in the best interest of the pupil or where pupils may be experiencing abuse, neglect, and exploitation as a result of actions by parents/carers, or other individuals in their lives
- being mindful of negative stereotypes when making decisions which might lead to false assumptions

2. Verbal and non-verbal communication should be respectful, non-blaming, clear, inclusive, and adapted to pupil's, parents'/carers' needs. Staff should ensure that all materials provided to pupils, parents/carers, and families are jargon free, developmentally appropriate and in a format that is easily understood.

Where appropriate, material provided to pupils and parents/carers should be made accessible and translated into their first language if necessary. Professional interpreters should be provided where needed. Schools should not need to rely on family members or partners for interpretation services, including British Sign Language.

3. Staff should empower parents/carers to participate in decision-making to support and protect pupils by:

- creating a culture of "no surprises", for example, making parents/carers aware of who will attend meetings and discussions, if the pupil will be invited to participate, and the format of the meeting or discussion
- explaining that parents/carers may be able to bring a family member, a friend or supporter to meetings, where appropriate, needed and agreed by the school

- giving parents/carers adequate preparation at every stage, relevant information, a safe and appropriate environment for participation and suitable access arrangements
- signposting parents/carers to sources of help and support available locally or through the local authority (see below)
- helping parents/carers to understand what the issues are and how these impact on the pupil, what decisions could be made, what changes need to be made, why and how, timescales and possible outcomes

4. Staff must involve pupils, parents/ carers in designing processes that affect them. They value their contributions, expertise and knowledge reflecting them in intervention design and continuously seek feedback from them to inform improvements. Schools will also use feedback from pupils and parents/ carers to reflect on their own practice.

S Multi Agency Working Arrangements (MASAs)

For more information about our approach to multi- agency working, please see WTSC 2026 Chapter 2 and below in Part 3.

Protecting children from abuse, neglect and exploitation requires multi-agency join-up and cooperation at all levels. Robust local multi-agency arrangements help to ensure that information about a child and their family is shared effectively, likelihood of harm is correctly identified and understood, and that all children and families receive targeted services that meet their needs in a coordinated way. This includes 'looked after children'.

In the UK, the way that the school and agencies involved in safeguarding work together is known as Multi-Agency Safeguarding Arrangements (MASAs)*. The three Safeguarding Partners are responsible and accountable for MASAs in their local area. By law, the Safeguarding Partners must jointly, and make widely available an annual report detailing the activity they have undertaken, focusing on multi-agency priorities, learning, impact, evidence, and improvement. This includes evidence of the impact of the work of any 'Relevant Agencies' i.e. schools (see below)

The purpose of MASAs is to ensure that, at a local level, organisations and agencies (including schools) are clear about how they will work together. This means:

- there is a clear, shared vision for how to improve outcomes for children locally across all levels of need and all types of harm
- when a child is identified as suffering or likely to suffer significant harm there is a prompt, appropriate and effective response to ensure the protection and support of the child
- organisations and agencies are challenged appropriately, effectively holding one another to account
- the voice of children and families combined with the knowledge of experienced practitioners and insights from data, provide a greater understanding of the areas of

strength and/or improvement within arrangements and practice

- information is sought, analysed, shared, and broken down by protected characteristics to facilitate more accurate and timely decision-making for children and families, and through this the identification of groups of children who may be disproportionately over- or under-represented in services, to understand outcomes for different communities of children
- effective collection, sharing and analysis of data enables early identification of new safeguarding risks, issues, emerging threats, and joined-up responses across relevant agencies, including the identification of groups of children who may be disproportionately over- or under-represented in services, so that services are adapted to address these issues
- senior leaders promote and embed a learning culture which supports local services to become more reflective and implement changes to practice
- senior leaders have a good knowledge and understanding about the quality of local practice and its impact on children and families

Relevant Agencies

The school, including early years provision (where offered), whilst not being one of the three Safeguarding Partners, nevertheless is known as a 'relevant agency' and therefore must act in accordance with the local safeguarding arrangements in order to safeguard and promote the welfare of our pupils.

The school is vital to the successful delivery of MASAs, and play a significant and often statutory role, thus there is a duty to ensure school functions are discharged via working in collaboration with other agencies. Schools are often best placed in building relationships, identifying concerns and providing direct support to pupils. Staff may be the first trusted adult to whom pupils report safeguarding concerns.

As part of this responsibility in MASAs, the school should:

- have a clear understanding of its responsibilities in relation to safeguarding pupils, and how it will discharge them
- co-operate with Safeguarding Partners to improve, implement, and monitor effectiveness of the local safeguarding arrangements
- share information and data about safeguarding issues and concerns affecting pupils to contribute to local priorities
- ensure local MASAs are fully understood, and rigorously applied within the school, including responding to safeguarding audits of quality and compliance, as requested by the local authority and/or local Safeguarding Partners. This is to ensure that policies are consistent with the local MASAs and relevant legislation and/or regulations.

Where offered by the Safeguarding Partners, Heads, DSLs and DDSLs will engage in locally organised education sub - groups, training, networks, and practitioner forums.

*Pupils may reside in more than one local authority, and as such, the school may work alongside a number of Safeguarding Partners and adhere to procedures under varying MASAs; should the pupil require support/a referral to children's Social Care, the school must use the procedures and threshold documents for the authority in which the pupil resides.

Part 2: Knowledge Base

For further information and resources, please see KCSIE - Annex A.

A. Categories of abuse: Physical, Emotional, Sexual, and Neglect
B. Domestic Abuse, including controlling or coercive behaviour and CAPVA
C. Child on Child Abuse, including harassment and violence
D. Problematic Sexual Behaviour, Harmful Sexual Behaviour, Sexual Violence, and Sexual Harassment
E. Child Criminal Exploitation and Serious Violence
F. Child Sexual Exploitation, including group CSE
G. Financially Motivated Sexual Exploitation
H. AI Generated Child Sexual Abuse Material
I. Sharing self-generated intimate imagery/videos (also known as sharing nudes/semi-nudes), including those generated by AI
J. Honour Based Abuse
K. Forced Marriage
L. Female Genital Mutilation, Virginity testing, Hymenoplasty, and Breast Flattening
M. Faith/belief-related Abuse
N. Behavioural indicators in children
O. Behavioural indicators in adults
P. Grooming
Q. Radicalisation
R. Adverse Childhood Experiences
S. Mental Health
T. Children who may have specific vulnerabilities
U. Stages of early intervention and child protection
V. Contextual Safeguarding
W. Signposting to further information

A Categories of Abuse

Abuse

Abuse is a form of maltreatment of a child.

Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects (see below).

All staff should be aware of indicators of abuse, neglect, and/exploitation so that they are able to identify pupils who may need help or protection.

Exercising professional curiosity i.e. not relying on parent/carer accounts and knowing what to look for is vital for the early identification of possible harm occurring so that staff can identify pupils who may be in need of early/family help or protection.

Children may be abused, neglected and/or exploited:

- in a family or in an institutional or community setting known to them or, more rarely, by others
- wholly online, or technology may be used to facilitate offline harm
- by those known to them or, more rarely, by others not known to them
- by an adult (s) or by another child (ren)

Children may also cause harm to other family members, often referred to as child to parent or care giver abuse (see below for CAPVA).

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

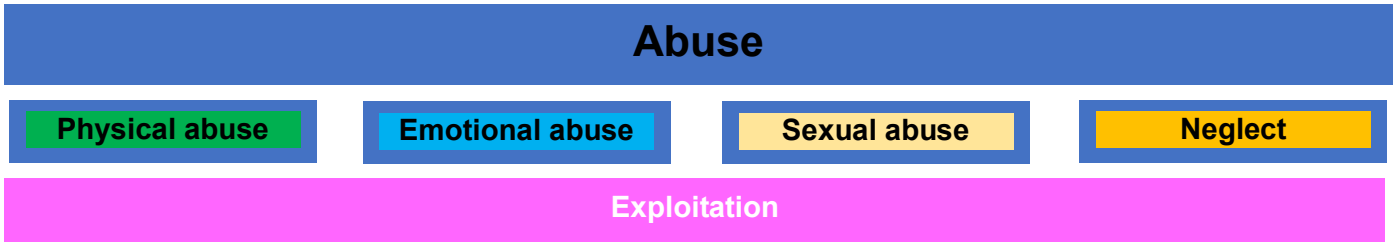
The following behaviours and indicators can be signs that children are at risk:

- drug taking and/or alcohol misuse
- unexplainable and/or persistent absences from education
- serious violence, criminal exploitation (including that linked to county lines), radicalisation, and
- consensual and non-consensual making or sharing of nudes or semi-nudes

Additional information on these safeguarding issues and information on other safeguarding issues is included in Annex A.

However, most guidance refers to there being four main categories of abuse: physical, emotional, sexual, and neglect (WTSC 2026).

This policy will now explore these categories below.



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.

Signs of physical abuse can include:

- injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen
- respiratory problems from drowning, suffocation, or poisoning
- untreated or inadequately treated injuries
- bruising which looks like hand or finger marks or caused by an implement
- cigarette burns, human bites
- scarring, scalds, and burns

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 as far as they meet the needs of another person. It may include verbal abuse, such as the persistent criticism, belittling, or name calling, as well as 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. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Signs of emotional abuse tend to be behavioural rather than physical (see below).

Emotional abuse can also be present when they exposed to parental conflict that is frequent, intense and unresolved.

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or penetration with an object), 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. Most sexual abuse is committed by individuals known to the victim. The sexual abuse of children by other children is a specific safeguarding issue known as child-on-child abuse and is explored below. Staff must be aware of child-on-child abuse, and the school systems for dealing with it.

Signs of sexual abuse displayed by children may include:

- pregnancy
- sexually transmitted infection/diseases
- pain/itching/bleeding/bruising/discharge to the genital area/anus/mouth
- urinary infections
- difficulty walking, sitting or standing
- persistent sore throats
- stomach-ache
- sexualised behaviour, statements, and language that are not age appropriate.
- re-enacting sexual acts with items or other children
- reluctance/keenness to undress
- over familiarity, and/or no caution when going to strangers
- reluctance to interact with certain adults (although please remember that some children will still have 'normal' and often warm interactions with abusing parents, especially if they are younger or have developmental/learning difference)
- wetting after being dry
- soiling/smearing

Under the **Crime and Policing Act (2026)** there is now a mandatory reporting duty for staff in regard to reporting concerns about child sexual abuse.

The duty requires those taking part in regulated activity to make a report if they:

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

Resources

The Centre of Expertise on Child Sexual Abuse has free evidence-based practice resources to help professionals working with children and young people to identify and respond appropriately to concerns of child sexual abuse. They have also introduced resources to help education professionals identify and respond to concerns of child sexual abuse and abusive behaviours.

Supporting parents and carers: a guide for those working with families affected by child sexual abuse Centre of Expertise on Child Sexual Abuse

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, because 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.

Signs of possible neglect include the child being:

- underweight or is small for their age, or their weight deteriorates
- very overweight for their age
- poorly clothed, with inadequate protection from the weather
- often absent from school for no apparent reason; or persistently arrive late
- regularly left alone, or in charge of younger brothers or sisters

Early Years –

Pupils in the early years stage are particularly vulnerable to abuse, neglect and/or exploitation, and may present differently to older children*. Warning signs often appear as a pattern over time rather than one single incident (although this can also occur).

Therefore, staff must:

- maintain a child-centred approach, ensuring that the pupil's needs and experiences are actively considered and represented in assessments and decision-making. This includes interpreting non-verbal and pre-verbal cues and observing interactions between the pupil and their parents/carers
- be professionally curious, particularly when relying on parent/carer accounts of injuries/illness
- be vigilant to any changes in presentation (pupil and parents/carers)
- consider and know the wider family network, including fathers and male carers, kinship

carers, and others providing day-to-day care, recognising that multiple adults may be involved in the pupil's life

*For more information on recognising signs and indicators of abuse in children in the Early Years stage, please read this NSPCC Learning.

All staff should have an awareness of safeguarding issues that often overlap and can put children at risk of harm (including but not limited to those listed below).

The following behaviours and indicators can be signs that children are at risk:

- drug taking and/or alcohol misuse
- unexplainable and/or persistent absences from education
- serious violence, criminal exploitation (including that linked to county lines), radicalisation,

Additional information on these safeguarding issues and information on other safeguarding issues is included in Annex A (KCSIE 2026).

B Domestic abuse, including controlling or coercive behaviour and CAPVA

Domestic Abuse

The Domestic Abuse Act (2021) introduced the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right.

Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act). who are, or have been, intimate partners or family members regardless of gender or sexuality.

Children can be victims of domestic abuse in their own right if they see, hear or experience the effects of domestic abuse and are related to either victim or perpetrator of the abuse, or either the victim or perpetrator of the abuse has parental responsibility for that child.

They may also experience domestic abuse in their own intimate relationships (teenage relationship abuse).

Domestic violence and abuse may be a single incident or pattern of incidents, and/or a course of conduct which can encompass a wide range of abusive behaviours, including:

a) physical or sexual abuse

b) violent or threatening behaviour

c) controlling or coercive behaviour (see below)

d) economic (financial) abuse

e) psychological, emotional, or other abuse such as 'honour' based abuse, faith- or belief-based abuse, forced marriage, Female Genital Mutilation or reproductive coercion, harassment and stalking.

Impact

Exposure to domestic abuse and/or violence can have a serious, detrimental and long-term impact on a child's health, wellbeing, development, and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Emotional abuse can also be present when a child exposed to parental conflict that is frequent, intense and unresolved (see above).

Operation Encompass

Operation Encompass (OE) is included within the Victim and Prisoners Act (2024), and in November 2025, a new statutory duty was placed on the Police to notify a child's education setting e.g. the school, and where relevant, local authorities, if they have reasonable grounds to believe a child may be a victim of domestic abuse. The duty applies to **all** children in education from reception up to the age of 17.

Free training for schools is available via https://operationencompass.vc-enable.co.uk/Register

OE operates in all Police forces across England. It helps Police and schools work together to provide emotional and practical help to children and families where abuse is happening. The system ensures that when the Police are called to an incident of domestic abuse, they notify the school under their statutory duty to do so where pupils:

- are connected to a household where the Police have attended a domestic abuse incident
- are physically present at the incident
- are not physically present during the incident
- might reside in another household temporarily or permanently

This Police notification ensures that the school has up-to-date relevant information about the pupil's circumstances and can enable immediate support to be put in place, according to the pupil's needs.

Data protection

Operation Encompass involves the sharing of personal and sensitive information about children and families. Police forces and educational settings are responsible for deciding how and where information about incidents and notifications are made. They must ensure it remains confidential, is held securely, and adheres to the requirements of the data protection laws. The DSL is the 'Key

Adult' for Operation Encompass notifications, and liaising with families where appropriate. The OE notification should include:

- the name, date of birth and protected characteristics (e.g., disability, race, religion etc.) of any child from the school who is related to any adult involved in the incident, whether the adult is the alleged perpetrator or non-abusive relative
- the relationship of the child to the victim and to the perpetrator
- the Police unique reference number (for the incident)
- the location, time and date of the incident
- if the child was present, and if so, where they were
  (notifications should be shared even if the child was not present at this particular incident)
- •the voice of the child, such as what they are saying and how they were/are behaving
  The OE notification should not include i.e. disclose to the school:
- information or reference to sexual offences disclosed at the domestic abuse incident. This is because under the Sexual Offences (Amendment) Act 1992, anonymity for victims of sexual offences must be preserved.

Referrals following an Operation Encompass notification

Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the Police and/or the school will make a referral to local authority children's Social Care if they are concerned about a pupil's welfare /safety.

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available from 8am to 1pm, Monday to Friday on 0204 513 9990 (charged at local rate).

National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- NSPCC- UK domestic-abuse Signs Symptoms Effects
- Refuge what is domestic violence/effects of domestic violence on children
- Safe Young Lives: Young people and domestic abuse | Safelives
- Domestic abuse: specialist sources of support (includes information for adult victims,

young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)

- Operation Encompass (includes information for schools on the impact of domestic abuse on children)
- The Home Office publish guidance on Controlling or coercive behaviour which provides clear information on what constitutes controlling or coercive behaviour and how to identify the offence.

Controlling or coercive behaviour

Controlling or coercive behaviour is a form of domestic abuse and is included in the definition of domestic abuse in section 1(3)(c) of the Domestic Abuse Act 2021.

In 2015, the offence of controlling or coercive behaviour was introduced under Section 76 of the Serious Crime Act as a criminal offence.

Controlling or coercive behaviour is a pattern of abuse (on two or more occasions) that involves multiple behaviours and tactics used by a perpetrator to (but not limited to) hurt, humiliate, intimidate, exploit, isolate, and dominate the victim. It is an intentional pattern of behaviour used to exert power, control, or coercion over another person and can also be present in teenage relationships or between a child and adult.

Controlling or coercive behaviour is often committed in conjunction with other forms of abuse and is often part of a wider pattern of abuse, including violent, sexual, or economic abuse.

Children can be used to control or coerce the victim, for example, by frustrating child contact and/or child arrangements, telling the children to call the victim derogatory names or to hit the victim, or by threatening to abduct the children.

This pattern of abuse causes fear, serious alarm and/or distress which can lead to a substantial adverse effect on a victim's day-to-day life. This can have a significant impact on children and young people

Section 68 of the Domestic Abuse Act 2021 came into force on 5 April 2023 and removed the 'living together' requirement for the controlling or coercive behaviour offence, which means that the offence applies to partners, ex-partners or family members, regardless of whether the victim and perpetrator live together.

More information about controlling or coercive behaviour, including the impact on children can be found in the Controlling or coercive behaviour: statutory guidance and the Domestic Abuse Act 2021.

Child-to-Parent Aggression and Violence (CAPVA)

CAPVA describes a pattern in which a child or young person uses physically or emotionally harmful behaviour towards a parent or caregiver in the home. It is more common than most professionals realise, and significantly under-reported.

In the UK, research commissioned by the Violence Reduction Unit found that at least 40 per cent of parents or carers who experienced violence from their children chose not to report it, with shame and fear of criminalisation among the most common reasons. Separate research from Respect found that CAPVA featured in between 21 and 27 per cent of youth offending caseloads, and accounted for between 64 and 67 per cent of police domestic abuse incidents where the suspect was under 18.

Families experiencing CAPA often present to school staff before they reach any other service. The impact shows up in pupil's behaviour, attendance, and emotional wellbeing: presentations that schools are already managing, often without the fuller picture of what is happening at home.

Resource: capafirstresponse.org

C Child-on-Child Abuse (including harassment and violence)

Please see Part 3 -Process for information related to managing situations involving child-on-child abuse.

Child on child abuse is any form of abuse/exploitation perpetrated by a child towards another child (including online).

Abuse is abuse, exploitation is exploitation, and child-on-child abuse must be taken as seriously as abuse, neglect and/or exploitation by an adult.

All staff must:

- know that pupils are capable of abusing their peers and other pupils (and that this can happen both inside and outside of the school, including online)
- be aware that child-on-child abuse is a safeguarding issue for both the victim (s) and perpetrator(s)
- know that abuse can occur in intimate personal relationships between peers and other children
- be alert to when pupils might be at highest risk around the school day (for example immediately before/after school, during recreational times in school, and on home-school transport)

- be alert to possible indicators of safeguarding concerns which may indicate child on child abuse, know the systems within the school for managing situations involving child-on-child abuse, and understand their role in preventing, identifying, and responding to child-on-child abuse (including the promoting of pupil reporting systems)

- acknowledge that even if there are no reports of child on child abuse it does not mean it is not happening in the school; it may be the case that it is just not being reported by pupils

- assume and take the approach that child on child abuse is occurring, be vigilant at all times, and act accordingly.

- challenge inappropriate behaviour between pupils that are abusive in nature

- never dismiss abusive behaviour, including any form of sexualised behaviour as described within this policy, as a normal 'part of growing up', 'banter' or 'just having a laugh' and should not develop high thresholds before taking action. This can lead to a culture of unacceptable behaviour, misogyny, and create an unsafe environment for pupils, and in worse cases a culture that normalises abuse leading to pupils accepting it as normal and not coming forward to report it

- be aware that child-on-child abuse may involve serious physical harm or threats involving weapons

- speak to their DSL or DDSL is they have any concerns regarding child-on-child abuse

- know that child-on-child abuse is **preventable,** and that timely, evidence-based support can be key to preventing pupils from going on to commit abuse or violence.

Child on child abuse can take many different forms, including, but not limited to:

- bullying (including cyber-bullying, prejudiced-based, and discriminatory bullying)[1]
- intimate personal relationship abuse[2], often referred to as 'teenage relationship abuse'.
- domestic violence[3] including coercive or controlling behaviour
- physical abuse such as hitting, kicking, shaking, biting, hair-pulling or otherwise causing physical harm (including any online element which facilitates, threatens and/or encourages physical abuse)
- serious physical assault and harm, or the threat of harm with a weapon
- child sexual exploitation[4], including group child sexual exploitation (see below)
- youth and serious youth violence[5]

[1] Please see the school's Anti-Bullying Policy.

[2] https://www.disrespectnobody.co.uk/relationship-abuse/what-is-relationship-abuse/

[3] This type of abuse relates to abuse between children aged 16 and 17 who are or have been intimate partners or family members. The abuse includes but is not limited to psychological, physical, sexual, financial and emotional.

[4] This is a form of sexual abuse where children are sexually exploited for money, power or status. This abuse can be perpetrated by other children or by adults. It can involve violent, humiliating and degrading sexual assaults. In some cases, children are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online.

[5] Serious youth violence is any of the most serious offences where the victim is aged 19 or below, including murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. Youth violence also includes assault with injury offences.

- 'upskirting' (see below)
- Problematic and/or harmful sexual behaviour[6] (see below) including misogyny/misandry
- gender-based violence[7]
- 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
- 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 (including sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse)
- stalking, including within intimate personal relationships
- consensual* and non-consensual creating/sharing of self-generated intimate images and/or videos (also known as sharing nudes/semi-nudes), including those generated using AI e.g. deepfakes
- financial exploitation, and financially motivated sexual extortion
- creating or sharing AI generated child sexual abuse material
- 'initiation/hazing' violence and rituals, (this could include activities involving harassment, humiliation, abuse, degradation, used as a way of initiating a person into a group and may include an online element)

*Consensual image sharing, especially between older pupils of the same age, may require a different response. It might not be abusive, but pupils still need to know it is illegal, whilst non-consensual is illegal and abusive.

These categories of abuse rarely take place in isolation and often indicate wider safeguarding concerns. For example, a teenage girl may be in a sexually exploitative relationship with a teenage boy who is himself being physically abused by a family member or by older boys. Equally, while children who abuse may have power over those who they are abusing, they may be simultaneously powerless to others. Staff should be aware that there may be multiple perpetrators and/or victims, and not consider that only one pupil abuses another in isolation.

Protected Characteristics

Child on child abuse is often motivated by prejudice against particular groups, for example, but not limited to: on grounds of race, religion, gender, sexual orientation, gender identity, special educational needs and/or disability, being neurodivergent, or because a child is looked after, is adopted or has caring responsibilities. It might be motivated by actual differences between children, or perceived differences, including but not being limited to physical strength, status, and access to economic or other resources. All incidents of child-on-child abuse, both physical, verbal, and emotional, on the basis of protected characteristics **must** be taken extremely seriously.

When does behaviour become abusive/exploitative?

It can be difficult to distinguish between abusive and/or exploitative behaviour, which should be dealt with in accordance with the procedure set out below, and behaviour which does not constitute abuse and/or exploitation.

[6] This is any sexual behaviour by a child or young person which is outside of developmentally "normative" parameters. This can (but does not always) include abusive behaviour such as sexual assaults.

[7] This is violence that is directed against one gender as a result of their gender.

Factors which may indicate that behaviour is abusive and/or exploitative include:

a) where it is repeated over time and/or where the perpetrator (s) intended to cause serious harm
b) where there is an element of coercion or pre-planning
c) where there is an imbalance of power, for example, as a result of age, size, social status or wealth.

This list is not exhaustive, and staff should always use their professional judgment and discuss any concerns with the DSL, who in turn should seek guidance from the RSL where needed.

How can staff identify victims of child-on-child abuse?

Identifying child on child abuse can be achieved by being alert to changes in a pupil's well-being and to general signs of abuse and/or exploitation. Signs that a pupil may be suffering from child-on-child abuse overlap with those relating to other types of abuse, neglect and/or exploitation – see indicators, earlier in this document.

Signs can include, but are not limited to:

- unexplained, persistent and/or prolonged absence from school
- disengaging from classes, or struggling to carry out school related tasks to the standard staff would ordinarily expect from the individual pupil i.e. a change
- physical injuries (often with inconsistent accounts)
- having difficulties with their mental health and/or emotional wellbeing
- becoming withdrawn, shy, experiencing headaches, stomach aches, anxiety, panic attacks, suffering from nightmares or lack of sleep or sleeping too much
- new (or increased) access to drugs and/or alcohol use
- changes in appearance and/or starting to act in a way that is not appropriate for the pupil's age including sexualised behaviours
- change in health needs, including sexually transmitted infections and unwanted pregnancy
- changes in social groups
- avoidance of certain areas of school or community
- reluctance to go home

This list is not exhaustive and the presence of one or more of these signs does not necessarily indicate child-on-child abuse.

Are some children particularly susceptible/vulnerable ?

Any child can be affected by child-on-child abuse and/or exploitation; however, research suggests that:

- Child on child abuse is more prevalent amongst children aged 10 and older, although it also affects younger children, including by way of harmful sexual behaviour.

- Children who are particularly vulnerable to abuse /exploitation or to abusing/exploiting others include those who have

  (i) witnessed or experienced abuse, exploitation or violence themselves
  (ii) suffered from the loss of a close family member or friend (recent or historical)
  (iii) experienced considerable disruption in their lives.

- as stated above, children with protected characteristics, but especially those with SEN/D and those who are LGBTQ+ or gender questioning/transitioning are particularly vulnerable child-on-child abuse, often in the form of bullying (both direct and online).

Risks can be compounded where pupils lack a trusted adult with whom they can be open. The school will endeavour to reduce the additional barriers faced and provide a safe space for these groups of vulnerable pupils to speak out or share their concerns with trusted members of staff.

How prevalent is child-on-child abuse?

Recent research suggests that child-on-child abuse is one of the most common forms of abuse affecting children. For example:

- 25% children had experienced some kind of aggression at least once or twice in the past three months and 12.1% indicated they had been victims of bullying (Spain)
- 20% and 25% of child sexual abuse is committed by other children (Australia). In the UK, this figure is closer to 35%.
- 41.3% of boys and 28.3 % of girls, who participated in a cross-national study reported that they were involved with bullying over two or three times per month either as bullies, as victims or as bullies/victims. Another study conducted in a sample of 369 children reported a percentage of 22.8% of victims in primary schools (Greece).
- 42% of pupils report being subjected to harassment by peers in secondary school (India).
- 9% of young people have received sexual threats online from people their age in the last year (Australia)
- 29% have witnessed people their age making sexual threats, for example unwanted sexual behaviour or violence, in the last year (Denmark, Hungary and the UK).
- 10% of female higher education pupils in a partnered relationship report experiencing intimate partner violence (United States)

How does the school raise awareness of, and reduce the risk, of child-on-child abuse?

Staff are trained on the nature, prevalence, and effect of child-on-child abuse, and how to prevent, identify and respond to it. The school actively seeks to prevent all forms of child-on-child abuse by educating pupils and staff, challenging the attitudes that underlie such abuse, encouraging a culture of tolerance and respect amongst all members of the school community, and responding to all cases of child-on-child abuse and any cases of bullying or cyber-bullying promptly, fairly and appropriately.

Pupils are educated about the nature and prevalence of child-on-child abuse via our PSHE and RSE sessions. Pupils are told what to do if they witness or are victims of such abuse, the effect that it can have on the victims and the possible reasons for it, including vulnerability of the perpetrator. They are regularly informed about the school's approach to such issues, including its zero-tolerance policy towards all forms of bullying and child on child abuse, including Problematic Sexual Behaviour, Harmful Sexual Behaviour, Sexual Harassment and Sexual Violence (see below).

All incidents should be responded to in accordance with this policy and process contained in Part 3-Process.

Resources

The UKCIS Education Group has published Sharing nudes and semi-nudes: advice for education settings working with children and young people which outlines how to respond to an incident of self-generated intimate images and/or videos being shared.

D Problematic Sexual Behaviour, Harmful Sexual Behaviour, Sexual Harassment, and Sexual Violence

Please see Part 3-Process for more information related to managing situations involving problematic Sexual Behaviour (PSB), Harmful Sexual Behaviour (HSB), Sexual Harassment and Sexual Violence

Child on child abuse can include four specific forms, known as Problematic Sexual Behaviour (PSB), Harmful Sexual Behaviour (HSB), Sexual Harassment and Sexual Violence.

The above sexual behaviours exist on a continuum ranging from normal and developmentally expected to inappropriate, problematic, abusive or violent. They also may overlap; therefore all staff working in the school should recognise the scale. The Hackett continuum (2010) provides a framework to understand the spectrum (range) of sexualised behaviour.

Advice on stages of typical sexual development and behaviour for different age groups can be found in Understanding sexualised behaviour in children | NSPCC Learning.

Staff must be aware that the behaviours can happen anywhere, can occur online and face-to-face (both physically and verbally) and are never acceptable.

All staff should understand that even if there are no reports of PSB, HSB, Sexual Harassment and/or Sexual Violence, in the school, it does not mean it is not happening; it may be the case that it is just not being reported by the pupils involved. Staff must, therefore, maintain an attitude of 'it could happen here', assume that it **is** happening, and act accordingly.

Impact

Children who are victims of PSB, HSB, Sexual Harassment and/or Sexual Violence - wherever and however it happens - are likely to find the experience stressful and distressing. Behaviour that is problematic, abusive or violent is developmentally inappropriate and may cause developmental damage This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) also attends the school. The school response, therefore, is vital.

This policy will now consider the continuum of sexual behaviours:

Problematic Sexual Behaviour (PSB)

PSB refers to developmentally inappropriate or socially unexpected, sexualised behaviour which does **not** have an overt element of victimisation or abuse (NSPCC 2026).

Harmful Sexual Behaviour (HSB)

The umbrella term 'harmful sexual behaviour' (HSB) is widely used in child protection and applies to behaviour occurring online, face-to-face, or both. HSB should always be considered within a child protection context. HSB is a broad term used to describe sexual actions by children that are developmentally inappropriate, cause harm to themselves or others, or are abusive towards another person (Hackett 2014). Other resources include the use of violence.

HSB is evaluated by considering the child's age, physical size, cognitive and emotional understanding, and whether there is an element of coercion, force, or a significant power imbalance. Distinguishing between experimental childhood sexual behaviour, problematic, and more concerning or harmful sexual behaviour can be a complex task and must be considered on a case-by-case basis.

Key Characteristics

Behaviours are typically classified as HSB if they exhibit one or more of the following:

Developmental Inappropriateness: Actions or language that are far beyond the expected norm for a child's specific age group

Coercion or Force: Making threats, bribing, or using physical dominance to force another child or adult into sexual activity.

Power Imbalances: Significant differences in age, physical size, or developmental stage between the individuals involved.

Secrecy and Shame: Using covert tactics or attempting to hide the behaviour due to knowing it is wrong.

Causal factors

There are a variety of factors that may contribute to a child or young person engaging in HSB, and often a combination of factors:

- difficulties with their family or home environment
- experience of trauma or abuse and/or disrupted care
- struggling in relationships with peers (those around their age) and poor social skills
- poor self-regulation and coping skills
- experience of social anxiety and a sense of social inadequacy, that makes it difficult to get on with other people and creates a sense of not “fitting in”
- poorly internalised rules for social behaviour
- a poor sense of acceptable personal boundaries like getting too close to people, not understanding social rules, not understanding what to say or to someone in a particular situation.
- difficulties forming secure and confident emotional attachments to other people
- lack of self-control, acting out their emotional experiences through negative or otherwise inappropriate behaviour.
- little insight into the feelings and needs of other people, and other people’s own mental state
- placing their own needs and feelings ahead of the needs and feelings of others.

HSB includes, and often intersects with misogny. Misogyny is defined as hostile or discriminatory beliefs and behaviours towards women and girls, both online and offline. It can include rape myths, sexist stereotypes, harmful masculine norms, hypermasculinity, and hostile beliefs and behaviours directed at women and girls from minoritised groups. In some children, inappropriate and PSB/HSB may already include elements of misogynistic attitudes or be motivated by gendered power. Where misogynistic ideas are expressed at school, staff should be conscious of everyday sexism, misogyny, homophobia and stereotypes, and should take action to build a culture where prejudice is identified and tackled, challenging the ideas, rather than the person expressing them. Staff have an important role in modelling positive behaviour and avoiding language that might perpetuate harmful stereotypes.

Factors influencing HSB

- the child’s age
- what the child observes (including the sexual behaviours of family and friends, and what they may have accessed through technology)
- what the child is taught (including cultural and religious beliefs concerning sexuality and physical boundaries).

Prevalence

There has been a sharp increase in children displaying HSB (offences up 47% in 2023–24 and rising again by 6% in 2024–25). Approximately 97% of sexual offences were committed by boys (Youth Justice Board (2026). Youth justice statistics: 2024 to 2025), however, not all HSB targets girls, as boys and LGBTQ+ children can also be harmed. Children with disabilities are also three times more likely to be abused than their peers (KCSIE 2026).

Research shows that most children who display HSB do not automatically become sexual offenders as adults, especially with the right interventions. Intervention focuses on education, building resilience, challenging harmful attitudes, and helping the young person understand healthy boundaries, intimacy, and consent. Having a sense of belonging has been identified as an important protective factor in preventing children from engaging in HSB.

Technology-assisted HSB (TA-HSB)

HSB can also take place through digital platforms or online. This is known as 'technology-assisted harmful sexual behaviour'

Sibling sexual abuse

Sometimes the term 'sibling sexual abuse' is used if HSB happens between siblings and needs assessment and intervention.

Sexual Harassment refers to 'unwanted conduct of a sexual nature'.

Offline sexual harassment

- making sexual comments about clothing or appearance
- telling sexual stories
- making lewd comments
- sexual taunting and/or name calling or 'jokes'
- displaying pictures, photos or drawings of a sexual nature
- upskirting (see below).
- physical contact, for example, brushing against someone deliberately or interfering with their clothes. It is important to assess whether the latter behaviours have crossed into sexual violence- it is vital to talk to and consider the experience of the victim.

Online sexual harassment

This may occur independently, or as a broader pattern of sexual harassment and/or sexual violence.

- consensual and non-consensual sharing of self-generated intimate images and/or videos (also referred to as sharing nudes and semi-nudes), including those generated using AI e.g. deepfakes*.
- sharing of unwanted explicit content
- sexualised online bullying

- unwanted sexual comments and messages, including, on social media
- sexual exploitation; coercion and threats, and
- coercing others into sharing intimate images/videos of themselves or performing acts they are not comfortable with online.

*Taking and sharing nude photographs (including those generated using AI e.g. deepfakes) of those aged under 18 is a criminal offence.

Such behaviour can:

- Violate a child's dignity
- Make them feel intimidated, degraded or humiliated; and
- Create a hostile, offensive or sexualised environment

Upskirting

'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress, and/ or alarm. Anyone of any gender, or sexual orientation can be a victim or perpetrator.

It is a criminal offence under the Voyeurism (Offences) Act (2019

Sexual Violence

Pupils and staff should understand that anyone can be a victim of sexual violence, regardless of sex, sexual orientation, gender reassignment or any other protected characteristic, and that the victim is never to blame.

It is important to acknowledge that most sexual violence is committed against women and girls, and it often has a gendered component – for example, manifesting an inequality of power between men and women. However, anyone can be affected by sexual violence, and staff should avoid language which stigmatises boys or suggests that boys or men are always perpetrators or that girls or women are always victims. Pupils and staff should understand the importance of challenging harmful beliefs and attitudes and should understand the links between sexism and misogyny and violence against women and girls.

All staff must be aware that child-on-child sexual violence can, and does occur, both inside and outside of school. Violence can often peak in the hours just before or just after school, when pupils are travelling to and from school, and can concentrate in particular places. These times can potentially have the highest risk for pupils, so it is important for schools to try to understand the local context, and identify where these places are by listening to pupils and asking them where they feel unsafe at regular intervals. DSLs can then liaise with local partners in a collaborative way.

In this policy, sexual violence refers to specific sexual offences under the Sexual Offences Act 2023, as described below:

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

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

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

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

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

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

For further guidance: Rape Crisis England & Wales - Sexual consent

Who perpetrates PSB, HSB, Sexual Harassment and/or Sexual Violence?

PSB, HSB, Sexual Harassment and Sexual Violence can:

- occur between any two children, or a group of children against one individual or group
- be perpetrated by a child of any age against a child of any age
- be perpetrated by a child of any sexual orientation against a child of any sexual orientation
- include behaviour that exists on an often-progressive continuum and may overlap
- be online and offline (physical or verbal)
- can take place within intimate personal relationships between children

Vulnerabilities

Any report of PSB, HSB, Sexual Harassment and/or Sexual Violence must be taken seriously.

Staff should be aware, that according to research, it is more likely that girls will be the victims of sexual harassment and/or sexual violence and more likely it will be perpetrated by boys. However, staff must always maintain an open mind.

Children with Special Educational Needs (SEND) are potentially more vulnerable, and there may be barriers in recognising abuse in this group of pupils. In addition, pupils who LGBTQ+ or are perceived by their peers to be LGBTQ+, and similarly those who are questioning their gender may potentially be more vulnerable (see above).

Signs and Indicators

All staff should be aware of the indicators in a pupil which may include, but not be limited to;

- increased absence from school, including truanting or going missing
- a change in friendships or relationships with older individuals or groups
- a significant change or decline in performance
- a significant change or decline in presentation
- signs of self-harm and/or suicidal ideation or a significant change/decline in wellbeing
- signs of physical assault or unexplained injuries
- unexplained gifts, money, and/or new possessions

Our approach to PSB, HSB, Sexual Harassment and/or Sexual Violence

The school will apply the principles set out in the above document when considering its approach to PSB, HSB, Sexual Harassment and/or Sexual Violence between pupils. Tolerating PSB, HSB and Sexual Harassment creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to Sexual Violence.

The DSL and DDSLs must have a good understanding of the sexual behaviour continuum in order to respond effectively to situations. This knowledge will support preventative education, and embed the whole school approach to safeguarding. Staff also need to understand child development and healthy developmentally appropriate behaviour, as well as issues of informed consent, power imbalances, and exploitation.

In this school we will:

- notice changes to pupil's behaviour, and be vigilant to them showing signs that signal distress
- recognise that a pupil may disclose to someone they trust, and that this could be anyone in the school. Staff should recognise the significance of being chosen, and respond with empathy

- recognise that the initial disclosure may not reflect the full extent of the abuse, and that trauma can impact memory meaning details may be affected (ask where, when, what etc i.e. open-ended questions)
- keep in mind that certain pupils may face additional barriers to disclosure (see above Vulnerabilities).
- not accept or tolerate PSB, HSB, Sexual Harassment and/or Sexual Violence
- not downplay or consider that these types of behaviours are 'banter', an 'inevitable part of growing up' or hold the view that 'boys will be boys', knowing that to do so may normalise inappropriate behaviours may create an unsafe culture where pupils feel less able to come forward with concerns
- recognising the escalatory nature of misogyny and the benefits that early identification plays in minimising the risk of PSB, HSB, Sexual Harassment and Sexual Violence
- encourage early intervention to avoid potential escalation, acting on any concerns immediately
- challenge inappropriate physical behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts
- challenge inappropriate verbal behaviour, such as making sexist comments, innuendo or taunting
- align with the Behaviour Policy with regards to imposing sanctions for inappropriate behaviour, including PSB, HSB, Sexual Harassment and/or Sexual Violence
- embed training and education on these issues within a strong pastoral system
- adopt a planned and sequenced programme across the whole curriculum including age-appropriate content around: consent, gender roles, misogyny, stereotyping and equality, healthy relationships, and power imbalances in relationships
- develop and encourage forums that enable pupils to talk about issues openly
- have and promote clear and accessible systems in place for pupils to confidently report abuse, knowing their concerns will be treated seriously,

Response

All sexual behaviour, whatever stage of the continuum it falls under, requires a response. However, the type of response required, and whoever offers that response, depends on the sexual behaviour and the pupil(s) displaying the behaviour. Schools must act appropriately to support and protect any pupils who have displayed behaviours and those who have been impacted by their behaviour.

The school will:

- act in the best interests of all pupils involved, reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the

impression that they are creating a problem by reporting PSB, HSB, Sexual Harassment and/or Sexual Violence

- manage any disclosure, either from the pupil who has suffered abuse or from other pupils, giving the victim(s) as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered, respecting their wishes. This will however need to be balanced with the school's duty and responsibilities to protect them and other pupils
- when assessing sexual behaviours, consider the ages and developmental stage of any pupils involved. Sexual behaviour between children may be considered harmful if there is a significant age difference, typically more than two years' difference or if one is pre-pubescent and the other is not. However, a younger child may also abuse an older child, especially if they hold power over them, e.g. due to a disability or physical size.
- when responding to incidents that involve self-generated imagery/videos (commonly referred to as nudes and semi nudes), including those generated by AI, whilst considering the legality of the situation, use a proportionate approach that considers the age, development, and circumstances of the children involved, as well as any elements of coercion, exploitation or vulnerability
- carry out a risk and needs assessment for all pupils affected by PSB, HSB, Sexual Harassment and/or Sexual Violence, including both the victim (s) and alleged perpetrator (s)- this may be informed by risk assessments completed/advice by external services. This risk assessment must include:

    - the victim's safety and support needs
    - potential other victims
    - the alleged perpetrator (s)
    - the wider school or community, and any actions that are needed to protect them from the alleged perpetrator (s) or from future harms
    - the location and time of the incident, with steps to improve safety in that area

- engage with both the victim's and the alleged perpetrator's parents/carers when there has been a report of PSB, HSB, Sexual Harassment and/or Sexual Violence The exception to this rule is if there is a reason to believe informing a parent/carer will put a pupil at additional risk. Schools will take advice from local authority children's Social Care regarding the latter (or Police if involved)
- consider the importance of understanding intra familial harms and any necessary support for siblings following incidents involving PSB, HSB, Sexual Harassment and/or Sexual Violence
- manage reports with two members of staff present, where operationally possible (one being the DSL/DDSL)
- not promise confidentiality to the pupil (s) involved as it is very likely that a concern will have to be shared further
- ensure that a written record is made of the incident/disclosure, and all actions taken

Situations will be taken on a case-by-case basis, however, individual pupils who have carried out PSB, HSB or Sexual Harassment may likely be referred to the local authority children's Social Care.

The Police and local authority children's Social Care will be involved in all cases where Sexual Violence has been reported.

A Safeguarding Risk Assessment must be completed for any pupil exhibiting any form of/is the victim of PSB, HSB, Sexual Harassment and/or Sexual Violence (and sent to the RSL for review).

More widely, school-based, age-appropriate curriculum linked interventions, often in RSHE lessons will be the most common approach to preventing behaviours (including misogyny), aiming to shift knowledge, attitudes, social norms, interpersonal skills, and bystander behaviours, with the latter sessions promoting empathy, and willingness to intervene.

Resources

How to manage incidents of harmful sexual behaviour | NSPCC Learning

The HSB toolkit from The Lucy Faithfull Foundation is designed for parents, carers, family members and professionals, to help everyone play their part in keeping children safe. It has links to useful information, resources, and support as well as practical tips to prevent harmful sexual behaviour and provide safe environments for families.

The Lucy Faithfull Foundation in collaboration with the Home Office, has also developed 'Shore Space', an online resource which works to prevent harmful sexual behaviour. Shore Space offers a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour.

The Lucy Faithful Foundation has also produced Responding to Sexual Threats and Sexual Comments.

The NSPCC provides free and independent advice about HSB: NSPCC Learning: Protecting children from harmful sexual behaviour and NSPCC - Harmful sexual behaviour framework.

Beyond Referrals | Contextual Safeguarding provides a school self-assessment toolkit and guidance for addressing HSB in schools.

The Preventing harmful sexual behaviour in children - Stop It Now provides a guide for parents, carers and professionals to help everyone do their part in keeping children safe, they also run a free confidential helpline.

The Anti-Bullying Alliance has developed guidance and training for schools about Sexual and Sexist bullying.

Schools should also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities. The principles described in Childnet's cyberbullying guidance could be helpful.

Additional information on confidentiality and information sharing is available at Safeguarding Practitioners Information Sharing Advice.

E Child Criminal Exploitation and Serious Violence

Child Criminal Exploitation (CCE)

CCE is where an individual and/or group takes advantage of an imbalance of power to coerce, control, manipulate, exploit, and/or deceive a child into any criminal activity;

(a) in exchange for something the victim needs or wants; and/or

(b) for the financial or other advantage of the perpetrator or facilitator; and/or

(c) through violence or the threat of violence.

CCE does not always involve physical contact; it can also occur through the use of technology. The victim may have been criminally exploited even if the activity appears consensual. CCE can be committed or facilitated by an organised network or gang, and victims may identify as part of this group. All children who are criminally exploited should have their vulnerabilities recognised by adults and professionals and should be treated as victims. It is not possible for a child to give informed consent to engage in criminal or other exploitative activity, and they cannot give consent to be exploited and/or abused.

CCE can also include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery, again they cannot give informed consent for this. Further information is available in the Modern Slavery statutory guidance. In accordance with this guidance, a relevant child protection and modern slavery referral should be completed where a potential victim of CCE is identified.

County Lines

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".

County Lines involve children and young people being engaged into gangs*, then being forced, coerced and/or manipulated into transporting drugs or money across the country. This is often from urban areas to suburban and rural areas, market, and seaside towns. *The child may identify as being part of this organized crime gang.

There are some additional specific indicators that may be present where a child is being criminally exploited through involvement in County Lines.

They may:

- go missing (from school or home) and are subsequently found in areas away from their home
- have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime)
- be involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
- be found in accommodation that they have no connection with, often called a 'trap house' or 'cuckooing' (see below) or hotel room where there is drug activity
- owe a 'debt bond' to their exploiters (see below), and
- have their bank accounts used to facilitate drug dealing.

Cuckooing (criminal takeover)

Note: 'A child cannot give their consent for their dwelling to be used in this way' (WTSC 2026).

Cuckooing is when criminals take over someone's home to use it as a base for crime. The victim's home may be used for: dealing drugs; storing weapons; sex work; other illegal activities. By using the victim's home, the criminal hopes they can avoid the Police. Criminals usually target vulnerable people. The victim may feel too frightened to tell anyone. They may still care about the criminal and see them as a friend. Some of these things could be a sign of cuckooing.

Debt Bondage

Children can become trapped by this type of CCE, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. This is known as 'debt bondage'.

Debt bondage is when someone forces or pressures a child to do things, saying that the child owes them money or drugs or something else they've been given. Sometimes the child may be told they are in debt without being given a reason, or as an excuse to threaten them.

The child might be forced to:

- Work for someone to pay them back
- Deliver packages or hold onto things
- Do something sexual or send self-generated intimate images/videos
- Commit crimes or take part in something illegal
- Hurt someone or do other jobs for the group

Vulnerabilities

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

Indicators

All staff should be aware of indicators which may signal that pupils are susceptible and/or at risk from, and/or are involved with, serious violent crime. These can include but are not limited to:

- increased absence from school, including truanting, being late, and going missing
- a change in friendships or relationships with older individuals and/or groups
- association with other pupils/children who have been involved in exploitation
- a significant change/ decline in academic performance
- a significant change/decline in presentation
- signs of self-harm, suicidal ideation, or a significant change/decline in emotional wellbeing
- unexplained gifts, money, or new possessions
- signs of physical assault or unexplained injuries

Serious Violence

Serious violence may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. Schools play a key role in protecting children from violence, safeguarding victims, as well as those who may be at risk of, or are involved in violence (who may also be victims themselves).

Risks are higher for children with disrupted education (e.g. suspensions, permanent exclusions) or a history of offending. Early, evidence-based support for those considered at risk, as well as in 'teachable moments' when issues emerge, is vital. This includes access to trusted adults, social and emotional skill support, and, where available, targeted interventions such as mentoring or therapeutic support.

Staff must:

- be alert to signs that a pupil may be at risk of or involved in serious violence
- be alert to when pupils might be at highest risk around the school day (after/before school)
- immediately and verbally report any concerns about a pupil carrying or using a weapon (or expressing intent to do so) to the DSL/DDSL who will assess the risk and take appropriate action. Where relevant. this will include any action needed to de-escalate peer conflict, and/or to contacting the Police as necessary

Resources

More information can be found in the UK government guidance KCSIE (2026), in the Home Office's 'Preventing youth violence and gang involvement' and its 'Criminal exploitation of children and vulnerable adults: county lines guidance'.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office here.

County Lines Toolkit For Professionals - The Children's Society in partnership with Victim Support and National Police Chiefs' Council.

Child Exploitation Disruption Toolkit

Further information on indicators, risk factors, and protective actions relating to serious violence, including when/how to contact the Police is provided in Annex A of KCSIE.

F Child Sexual Exploitation, including group-based

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse (see above) and occurs where an individual and/or group takes advantage of an imbalance in power to coerce, manipulate, exploit and/ or deceive a child into sexual activity. Whilst age may be the most obvious factor, this power imbalance can also be due to a range of *other* factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

CSE may involve physical contact, including assault by penetration (for example, rape or penetration with an object) 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. CSE, as well as being directly physical, can also be facilitated and/or take place online, or using a combination of offline/online exploitation and harm.

CSE can be perpetrated by individuals or groups or an organised network, males or females, and children or adults. Most sexual abuse is committed by those previously known to the victim.

The abuse can be a one-off occurrence or a series of incidents over time, and may happen without the child's immediate knowledge, for example through others copying/sharing videos or images of them on social media. The latter can be of the actual victim child, or those stating that the content is of the actual child, when it is not; AI generated imagery/videos can be used. Either way, this is exploitation and has harmed a child. It may range from opportunistic to complex organised abuse.

Victims can be exploited even when activity appears consensual as they may not realise that they are being exploited/harmed. This can be committed or facilitated by an organized network or gang, and victims may identify as part of this group. They may believe that they are in a genuine romantic relationship. CSE can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year-olds, who can legally consent to have sex.

It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence, both to the child and/or someone they know. As with CCE, victims are not lways recognised and can be criminalised for actions they take whilst under coercion.

CSE can also include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery, and further information is available in the Modern Slavery statutory guidance. In accordance with this guidance, a relevant child protection and modern slavery referral should be completed where a potential victim of CSE is identified.

The above CCE indicators can also be indicators of CSE, as can:

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

Group-based child sexual exploitation

Group-based CSE is defined as two or more individuals (whether identified or not) who are known to (or associated with) one another and are known to be involved in or to facilitate the sexual exploitation of children. Being involved in the sexual exploitation of children includes e.g. introducing them to other individuals for the purpose of exploitation, trafficking a child for the purpose of sexual exploitation, taking payment for sexual activities with a child or allowing their property to be used for sexual activities with a child, etc. This can be perpetrated within or beyond the family, by both children and adults, and groups can be organised or loosely linked.

Resources

For more information, see Child Sexual Exploitation: Guide for Practitioners

G Financially Motivated Sexual Extortion (FMSE)

Increasingly, children are being sexually coerced and exploited for money, rather than any sexual motivation underpinning the actions of the offender. The offender (known, posing as known, or unknown children/adults) will demand the victim child self-generated intimate imagery/videos (also known as sharing nudes or semi-nudes) (see below) and send this to them. Whether or not the victim child actually sends these, the perpetrator will blackmail the victim by threatening to share these or other images/videos online, and occasionally offline, with the wider community i.e. family,

friends, staff, and/or media unless the child victim sends **money/other** to them. This is sometimes known as 'sextortion' and there has been a rapid increase in these situations being reported nationally; many cases of course will not have been reported by children for a number of reasons.

Some young people have had deteriorating mental health due to this extortion. For this reason, the school will hold an 'open door' and supportive approach in regard to pupils sending self-generated intimate imagery/videos (also known as sharing nudes or semi-nudes), rather than seeking to criminalising them. This approach will enable pupils to feel able to share that they have shared self-generated intimate imagery/videos (also known as sharing nudes or semi-nudes), or been asked to do this, with the aim that they can receive the support they vitally may need in a timely manner. This is not the same as condoning or accepting the sharing of images/videos (nudes or semi-nudes) as the norm. The school is mindful that much of this behaviour is illegal and will follow their statutory duties where appropriate, including reporting matters on a case-by-case basis to the Police and Social Care as needed.

Resources

Find more information and advice from the Internet Watch Foundation here.
Financially motivated sexual extortion (FMSE): guidance for education settings on FMSE from the National Crime Agency's CEOP Education programme.

H Self-Generated Intimate Images/Videos (also known as the sharing of nudes and semi nudes), including by AI

*Please note that young people most commonly use the term 'nudes and semi-nudes', as referred to in KSCIE 2026. Where this section refers to self generated imagery/videos below, therefore please note that this includes nudes and semi nudes.

This policy only covers the sharing of self-generated intimate sexual imagery/videos by pupils, including those generated by AI e.g. deepfakes.

Possessing, creating, sharing and distributing sexual images/videos of under-18s is illegal, and therefore causes the greatest complexity for schools (amongst other agencies) when responding.

It also presents a range of risks which need careful management.

Staff must not ever view or forward illegal images of a pupil (or any other child).

Should they receive such from any source, then they must notify the DSL immediately.

What types of incidents are covered by this policy?

Yes:

- A pupil creates and shares self-generated intimate images/videos of themselves with another pupil/child (also under the age of 18).

- A pupil shares self-generated intimate images/videos created by another pupil/child with another pupil/child (also under the age of 18) or an adult.
- A pupil is in possession of self-generated intimate imagery/videos created by another pupil/child.
- A pupil creates and shares AI-generated sexual images/videos of a staff member (this will also be managed under the Behaviour Policy)

No:

- The sharing of self-generated intimate images/videos of children by adults constitutes child sexual abuse and schools must always inform the Police if they hear this has occurred or find this content on a pupil's/adult's device (or confirmed searches). Images/searches of this kind must not be deleted from a pupil or adult's phone.
- Pupils sharing pornography or exchanging sexual texts which do not contain imagery8.
- Sexual imagery downloaded from the internet by a pupil9.
- Sexual imagery downloaded from the internet by a pupil and shared with another pupil/child (also under the age of 18) or an adult.
- AI generated Child Sexual Abuse Material (CSAM) by adults (see below section)

Disclosure

All staff should understand, that even if there are no reports in their school it does not mean it is not happening; it may be the case that it is just not being reported by pupils. All members of staff (including non-teaching staff) should be aware of how to recognise and refer any disclosure of incidents involving the sharing of self-generated intimate images/videos, including those generated by AI,. This will be covered within staff training.

Disclosure about can happen in a variety of ways. The pupil affected may inform a class teacher, the DSL in school, or any member of the school staff. They may report through an existing reporting structure, or a friend or parent/carer may inform someone in school or a colleague or inform the Police directly. Any direct disclosure by a pupil should be taken very seriously. A pupil who discloses they are the subject of self-generated intimate images/videos, and/or those generated by AI imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in school is a last resort, and they may have already tried to resolve the issue themselves.

Resources

LGFL 'Undressed' provides schools advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.

For more guidance from UKCIS around sharing nudes/semi-nudes read here.

[8] All such incidents should be responded to with reference to the school's Online Safety Policy, and in line with the school's Safeguarding Policy

[9] As above

I AI Generated Child Sexual Abuse Material (CSAM)

The use of Artificial Intelligence (AI) to generate Child Sexual Abuse Material (CSAM) is increasing, and the technology is fast improving. As with all online safety challenges, this challenge is inherently international.

The term 'AI CSAM' to refer to criminal images or videos of the sexual abuse of children that are generated or edited by AI technology, and 'real CSAM' to clearly distinguish CSAM that is not generated or edited by AI technology.

The term 'deepfake' is used variously in the AI field, in the media, and among the wider population. Sometimes it is taken to refer to all AI-generated or AI-edited content.

This policy uses the term 'deepfake' to refer to partially synthetic content: edited content that is based on a real image or video but has been altered using AI technology. Incredibly realistic deepfake, or partially synthetic, videos of child rape and torture are made by offenders using AI tools that add the face or likeness of a real person or victim.

This is particularly important in the context of 'deepfake videos' edited (or 'faked') real videos which should be clearly distinguished from fully synthetic videos created by text-to-video or text-to-image-to-video

The Internet Watch Foundation (IWF) stated in their most recent report the following 5 key findings:

1. **Increase in AI-generated Child Sexual Abuse Material:** The latest findings show over 3,500 new AI-generated criminal child sexual abuse images have been uploaded on to the same dark web forum as previously analysed in October 2023.

2. **More Severe Images:** Of the AI-generated images confirmed to be child sexual abuse on the forum, more images depicted the most severe *Category A* abuse, indicating that perpetrators are more able to generate complex 'hardcore' scenarios.

3. **Emergence of AI Child Sexual Abuse Videos:** AI-generated child sexual abuse videos, primarily deepfakes, have started circulating, highlighting rapid technological advancements in AI models/generators. Increasingly, deepfake videos shared in dark web forums take adult pornographic videos and add a child's face using AI tools.

4. **Clear Web Increase**: There is a noticeable increase in AI-generated child sexual abuse imagery on the clear web, including on commercial sites.

5. **AI Child Sexual Abuse Featuring Known Victims and Famous Children:** Perpetrators increasingly use fine-tuned AI models to generate new imagery of known victims of child sexual abuse or famous children.

J Honour Based Abuse (HBA)

HBA includes all incidents or crimes which have been committed to 'protect or defend the honour' of the community and/or the family, and commonly involve practices such as FGM, forced marriage and/or breast flattening. Abuse often involves a wider network of family or community pressure, and can include multiple perpetrators and therefore it is important to be aware of this dynamic and consider additional risk factors when deciding on action. If staff have a concern that a pupil or adult may be at risk of Honour Based Abuse, they must alert their DSL immediately.

K Forced Marriage (FM)

FM is one entered into without the full and free consent of one or both parties and where violence, threats or any form of coercion is used to cause a person to enter into a marriage.

Forcing a person into marriage is a crime in England and Wales. Changes to the Marriage Act (1929) and the Civil Partnership Act (2004) came into effect in February 2023 which raised the legal marriage age to 18 years old. These changes mean that 16 to 17-year-olds are no longer able to marry or enter a civil partnership under any circumstances, even with parental or judicial consent. This Minimum Age Act expands the criminal offence of forced marriage in England and Wales to make it an offence in all circumstances to do anything intended to cause a child to marry before they turn 18 without the need to prove that the young person:

- is coerced into the marriage or civil partnership (e.g. threatened)
- is deceived into leaving the UK and coerced into marriage
- lacks the mental capacity to give consent

Resources

The Forced Marriage Unit (FMU) has created:

Multi-agency practice guidelines: handling cases of forced marriage

The right to choose: government guidance on forced marriage -GOV.UK (www.gov.uk)

School staff can contact the Forced Marriage Unit if they need advice or information:

Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

L Female Genital Mutilation, Virginity Testing and Hymenoplasty, and Breast Flattening

Female Genital Mutilation

Female Genital Mutilation is illegal.

It is abuse that encompasses all procedures involved in the partial or total removal of female external genitalia.

Whilst all staff should speak to the DSL (or deputy DSL) with regards to any concerns about FGM,here is a specific legal duty on teachers in the UK under the FGM Act (2003) to report FGM. 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 pupil under the age of 18, it is mandatory that the teacher must report this to the Police using the telephone number 101. They must be supported by a member of the safeguarding team should they do this.

Virginity testing and Hymenoplasty

Virginity testing and hymenoplasty are forms of violence against women and girls and are part of the cycle of so called ‘honour-based’ abuse.

Virginity testing

The law defines ‘virginity testing’ as “the examination of female genitalia, with or without consent, for the purpose (or purported purpose) of determining virginity.”

It is also referred to as hymen, ‘2-finger’ or vaginal examination, is an inspection of the female genitalia, intended to determine whether a woman or girl has had vaginal sexual intercourse. For the purposes of the Health and Care Act (2022), virginity testing is any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place. This is irrespective of whether consent has been given. The position of the World Health Organization and the Royal College of Obstetricians and Gynaecologists (RCOG) is that virginity tests have no scientific merit or clinical indication as there is no known examination that can prove whether a woman has had vaginal intercourse.

The hymen is a thin membrane that partially covers the entrance to the vagina. During puberty, oestrogen causes the hymen to change in appearance and become very elastic. Normal variations of the post-pubertal hymen range from thin and stretchy to thick and somewhat rigid. A non-intact, or stretched, hymen is not a reliable indication of past sexual activity, nor is it guaranteed that the hymen will break or bleed after the first vaginal intercourse.

Hymenoplasty

The law defines ‘hymenoplasty’ as the reconstruction of the hymen (with or without consent).

There are a number of different techniques to achieve but it generally involves stitching hymenal remnants together at the vaginal opening, or surgically reconstructing a hymen using vaginal tissue. The aim of the procedure is to ensure that a woman bleeds the next time she has intercourse to give the impression that she has no history of vaginal intercourse. There is no guarantee that this will fully reform the hymen or cause bleeding when penetration is attempted.

Both virginity testing and hymenoplasty can be precursors to child or forced marriage and other forms of family and/or community coercive behaviours, including physical and emotional control. Women who 'fail' a virginity test, are found to have undergone a hymen reconstruction, or do not bleed on their wedding night are likely to experience further so called 'honour-based' abuse including emotional and physical abuse, family or community disownment and even honour killings.

Emotional impact: The practices are degrading and intrusive. They can lead to extreme psychological trauma in the victim, and can provoke conditions including anxiety, depression and post-traumatic stress disorder. The practices have been linked to suicide.

Physical impact: They can be physically harmful. For example, virginity testing can result in damage to the hymen, tears and damage to the vaginal wall, bleeding, and infection. The risk of infection is also high in hymenoplasty, which has the added risks of acute bleeding during the procedure, scarring and narrowing of the opening of the vagina and sexual difficulties. Virginity testing and hymenoplasty are considered to have a similar level of seriousness to assault occasioning actual bodily harm. This is in recognition of the physical harm they can cause to the individual who is subjected to them. This level of seriousness also reflects the controlling attitudes that underpin the practices.

Prevalence: there is evidence that women and girls from the age of 13 are most at risk of undergoing a virginity test and/or hymenoplasty, but girls as young as 8 can be affected. As with other forms of so-called honour-based' abuse, these practices often take place behind closed doors, and because of this, the numbers of women and girls that are subjected to these practices are not known.

Who: any woman or girl, of any age, ethnicity, race, sexual orientation, religion, disability or socioeconomic status could be subjected to a virginity test or hymenoplasty.

Why: Women and girls are coerced, forced and shamed into undergoing these procedures, often pressurised by family members or their intended husbands' family in the name of supposedly upholding honour and to fulfil the requirement that a woman remains 'pure' before marriage. Some practitioners issue a certificate to prove 'virginity' after a virginity test or hymenoplasty, while some will simply tell the family or community members whether a woman or girl has 'passed' a virginity test.

Legislation: it is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK, as part of the Health and Care Act (2022). It is also illegal for UK nationals and residents to do these things outside the UK. These offences carry extra territorial jurisdiction and carry a maximum sentence of 5 years imprisonment and/or an unlimited fine.

Signs and Indicators: there are several indicators that a girl is at risk of or has been subjected to a virginity test and/or hymenoplasty:

- the girl requests either procedure or asks for help
- family members ask for the procedures or disclose that the girl has already undergone the practices
- there could be pain and discomfort after the procedures, which, for example, could result in the girl having difficulty in walking or sitting for a long period of time which was not a problem previously
- concern from family members that a girl has a boyfriend, or plans for the girl to be married
- a close female relative has been threatened with either procedure or has already been subjected to one
- the girl has already experienced or is at risk of other forms of so called 'honour-based' abuse
- the girl is already known to Children's Social Care in relation to other safeguarding issues
- the woman or girl may disclose other concerns that could be an indication of abuse. For example, they may state that they do not feel safe at home, that family members will not let them out the house and/or that family members are controlling
- the girl may have suffered trauma from being coerced and having to undergo the procedures. This could result in an increase in emotional and psychological needs, for example withdrawal, anxiety or depression, or significant change in behaviour. The trauma could also have long-term implications for the girl and may not manifest for many years after the event
- the girl may appear fearful of their family or a particular family member
- unexplained absence from school, potentially to go abroad
- changes in behaviour – becoming withdrawn, anxious, or depressed; a deterioration in schoolwork, attendance, or attainment

This is not an exhaustive list of indicators. If any of these indicators are identified, staff must inform the DSL and following safeguarding procedures.

Resources

Virginity testing and hymenoplasty: multi-agency guidance - GOV.UK

Breast Flattening
Breast flattening, also known as breast ironing, is the pounding and massaging of a pubescent's breasts. Hard or heated objects are used, to try to make the breasts stop developing or disappear. The practice is typically carried out by the girl's mother, who will say she is trying to protect the girl from sexual harassment and rape to prevent early pregnancy that would tarnish the family name, or to allow the girl to pursue education, rather than be forced into early marriage.

M Faith or belief- related child abuse

As a school, we respect, and do not challenge parents/carers' rights to have faiths or beliefs, but where these may/have led to abuse and/or a risk of harm to a pupil, we will seek advice from the authorities as required.

What is faith/belief related abuse?

Abuse linked to faith or belief is where concerns for a child's welfare have been identified, and could be caused by a belief in witchcraft, spirit or demonic possession, ritual or satanic abuse features; or when practices linked to faith or belief are harmful to a child. Research suggests that in 2023, the abuse of 2,140 was linked to faith/beliefs.

It is important to note that child abuse linked to faith or belief is not confined to one faith, nationality, and/ or ethnic community. Examples of this form of abuse have been recorded worldwide across various religions including Christians, Muslims, and Hindus. The number of known cases suggests that only a small minority of people who believe in witchcraft or spirit possession go on to abuse children and adults. Abuse may happen anywhere, but it most commonly occurs within the child's home. Under-reporting of abuse is, however, likely.

Harm to a child can take place due to the following known reasons:

- abuse as a result of a child being accused of being a 'witch'
- abuse as a result of a child being accused of being possessed by 'evil spirits'
- ritualistic abuse which is prolonged sexual, physical and psychological abuse
- satanic abuse which is carried out in the name of 'satan' and may have links to cults
- any other harmful practice linked to a belief or faith

In terms of the categories, explored above in section A:

Physical abuse: can involve ritualistic beating, burning, cutting, stabbing, semi-strangulating, tying up the child, or rubbing chilli peppers or other substances on the child's genitals or eyes.

Emotional abuse: can occur in the form of isolation. A child may not be allowed near or to share a room with family members and threatened with abandonment. The child may also be convinced that they are possessed.

Neglect: the child's family and community may have failed to ensure appropriate medical care, supervision, education, good hygiene, nourishment, clothing or warmth.

Sexual abuse: children who have been singled out in this way can be particularly vulnerable to sexual abusers within the family, community or faith organisation. These people exploit the belief as a form of control or threat.

Common factors and causes

A range of factors can contribute to the abuse of a child for reasons of faith or belief. Some of the most common ones are below:

Belief in evil spirits that can 'possess' children is often accompanied by a belief that a possessed child can 'infect' others with the condition. This could be through contact with shared food or simply being in the presence of the child.

Scapegoating occurs when a child is singled out as the cause of misfortune within the home, such as financial difficulties, divorce, infidelity, illness or death.

Behaviour that is attributed to spiritual forces. Examples include a child being perceived as disobedient, rebellious, overly independent, wetting the bed, having nightmares or falling ill.

Physical, learning, and/or emotional differences that single a child out. Documented cases included children with learning disabilities, mental health issues, epilepsy, autism, stammers, deafness and LGBTQ+.

Gifts and uncommon characteristics and/or when a child has a particular skill or talent can sometimes be rationalised as the result of possession or witchcraft. This can also be the case if the child is from a multiple or difficult pregnancy.

Complex family structures such as when a child living with extended family, non-biological parents, or foster parents can place them more at risk.

Signs and indicators

- physical injuries, such as bruises or burns (including historical injuries/scaring)
- a pupil reporting that they are or have been accused of being ‘evil’, and/or that they are having the ‘devil beaten out of them’
- the pupil or family may use words such as ‘kindoki’, ‘djin’, ‘juju’ or ‘voodoo’ - all of which refer to spiritual beliefs
- a pupil becoming noticeably confused, withdrawn, disorientated or isolated and appearing alone amongst other pupils
- a pupil’s personal care deteriorating (e.g. rapid loss of weight, being hungry, being unkempt with dirty clothes)
- it may be evident that the pupil’s parent or carer does not have a close bond with the pupil
- a pupil’s attendance at school becomes irregular or there is a deterioration in their performance
- a pupil is taken out of a school altogether without another school place having been arranged
- a pupil wearing unusual jewellery/items or in possession of strange ornaments/scripts.

Resources

National Schools Safeguarding Guidance (developed by Metropolitan Police Service)
The Guidance for Schools and Colleges: Safeguarding Children from Sexual Violence, CSE and Harmful Practices has a chapter on CALFB.

Schools Charter on Ending Harmful Practices
This Schools Charter encourages the delivery of high quality, safeguarding focused inputs on harmful practices.

UK Government: National Action Plan to Tackle Child Abuse Linked to Faith or Belief

Centre for FMD: 21-02-2024---Child-Abuse-linked-to-Faith-or-Belief-Leaflet.pdf

Child abuse linked to faith or belief | Metropolitan Police

N Behavioural signs in children

Staff must be aware and recognise that all behaviour is communication.

If a child is being abused, neglected and/or exploited, their behaviour may change in a number of ways.

For example, (but not limited to) they may:

- behave aggressively to self/others or be disruptive, act out, demand attention and require more discipline than other children
- become angry or disinterested socially, and/or show little creativity/motivation
- seem frightened of certain adults or child
- present as sad, withdrawn, and/ or depressed
- have trouble sleeping/sleep for longer periods than the norm for them
- become sexually active at a young age
- exhibit inappropriate/advanced sexual knowledge for their age
- exhibit sexualised behaviour in their play or interactions with other children
- refuse to undress/change for gym/PE, and/or refuse to participate in physical activities
- develop dysfunctional eating
- self-harm and/or express suicidal ideation and/or attempt to end their life
- have changes in their attendance, refuse to attend school, go missing whilst in school, or run away from home/go missing in the community
- lack confidence or have low self-esteem; in some situations, will have raised confidence and esteem initially
- use drugs and/or alcohol as a coping strategy for anxiety/ new use of drugs/alcohol
- have unexplained gifts, money, and/or other items
- spend increasing time online, and become socially isolated
- have a new group of friends (potentially older)
- be seen to leave school with unknown peers/adults

O Behavioural signs in parents/carers (or other adults)

Please see **Part C-Process** for information relating to Low-Level Concerns, Self-Reports, and Allegations

Signs may include:

- placing unrealistic expectations on the child i.e. demanding a level of academic or physical performance of which the child is not capable
- offering conflicting or unconvincing explanations of any injuries to the child/behaviours of the child

- delaying seeking medical treatment for the child's mental/physical health (including not taking the child to a specialist medical practitioner immediately when a child discloses suicidal ideation in school)
- failing to meet the basic needs of the child in regard to clothing, housing, food etc
- having alcohol/drug dependency/unmanaged mental illness and refusing support
- appearing indifferent to, is emotionally unavailable, or overtly rejecting, the child
- denying the existence of or blaming the child for the child's behaviours at home or at school
- seeing and describing the child as entirely worthless, burdensome, or in another negative light
- refusing offers of support to meet the child's need(s)
- refusing to consent to referrals to external agencies to meet their child's needs/does not engage as expected.

P Grooming

Grooming is *the process* by which an individual prepares a child, significant adults (including staff), and the environment for abuse and/or exploitation of this child.

The perpetrator's motivation can be sexual, or increasingly financially related (see above section G).

Children and young people can be groomed online or in the real world, by a stranger or by someone they know, or someone pretending to be someone they know, including peers.

Groomers may be of any biological sex, gender identity, and/ or sexual orientation. They could be of any age, including another young person.

They may be located in the country where the child lives, or if online exploitation, could be resident anywhere in the world.

Modus operandi of grooming

Target vulnerable victim: Perpetrators target victims who are vulnerable, isolated, insecure and/or have greater emotional needs. This may happen over a number of months/years, or may happen very quickly.

Gain victim's trust: Offenders may allow a child to do something (e.g. eat ice cream, stay up late, view pornography) which is not normally permitted by the child's parents or the school in order to foster secrecy and intimacy.

Gain the trust of others: Institutional offenders are often popular with children and parents, and often staff, successfully grooming not only the victim but also other members of the victim's family and the school community at large.

Filling a need/becoming more important to the child: This can involve giving gifts, rewards, additional help or advice, favouritism, special attention and/or opportunities for special trips or outings.

Isolating the child: The perpetrator may encourage dependency and subtly undermine the victim's other relationships with friends or family members. This may involve the offender making themselves the only/main point of contact in school for the child.

Sexualising the relationship: This can involve playful touches, tickling and hugs. It may involve adult jokes and innuendo or talking as if adults, for example about marital problems or conflicts.

Maintaining control and secrecy: Offenders may use their professional position to make a child believe that they have no choice but to submit to the offender.

Making threats: Offenders may threaten the child/their family/their friends/their pet with harm if they tell/do not continue with the abuse.

Blackmailing: Offenders may blackmail their victim, for example, by saying that they will share any intimate images/videos of the child, including those that are AI generated, with friends and family.

Creating opportunity: Offenders will gradually seek to create the time and opportunity to allow for the grooming process to occur, and the eventual abuse of the child (ren). This behaviour may involve the offender creating situations where they have access more easily, in unstructured scenarios and/or encouraging the children), and occasionally the parent/care unwittingly to do so.

Signs of grooming manifested by sex offenders (paedophiles)

Ilt is important to remember that not all sex offenders will exhibit the signs listed below and if an individual exhibits some or all of these signs, it does not mean that they are a sex offender:

Being overly affectionate with a child

- Affording special attention or preferential treatment to a child (ren)
- Gravitating towards a specific sex of pupil or year group
- Creating and/or spending excessive time alone with a child outside of the classroom/school
- Frequently spending time with a child in private or isolated areas in the school
- Transporting a child to or from the school
- Making friends with a child's parents and visiting their home socially
- Offering to provide a particular child additional educational support
- Acting as a particular child's confidante
- Giving small gifts, money, toys, cards, letters to a child
- Using texts, telephone calls, e-mails, messaging apps, and/or social networking sites to inappropriately communicate with a child

- Exhibiting flirtatious behaviour or making suggestive remarks or comments of a sexual nature around a child
- Making inappropriate and/or suggestive remarks about children to other staff

Signs and indicators that a child may be being groomed

Many children and young people do not understand that they are being/have been groomed, or that what has happened is abuse and/or exploitation. The signs that a child is being groomed are not always obvious. Groomers will also go to great lengths not to be identified.

Children may:

- be very secretive, including what they are doing online
- spend lots, much more, or much less time online, texting, gaming or using social media
- are withdrawn, upset or outraged after using the internet or texting
- are secretive about who they're talking to and what they're doing online or on their mobile phone
- have lots of new phone numbers, texts or e-mail addresses on their mobile phone, laptop or tablet
- have more than one phone
- be in a relationship with an older child offline/online (or perceive themselves to be with an older child)
- go to unusual places to meet friends; not disclose who they are meeting, or give false accounts of who they are meeting
- have new things such as clothes, money or mobile phones that they can't or won't explain
- have increasing or new access to drugs and alcohol
- be late for school, go missing from home or school; or are increasingly likely to be absent from school without adequate explanation
- display behavioural changes; these can be both negative and positive
- have sexual health issues
- attempt suicide, express suicidal ideation, and/or self-harm (including dysfunctional eating and/or excessive exercise)
- express indicators that they are anxious and/or depressed
- have low self-esteem (or occasionally high self-esteem in earlier stages of grooming)
- steal items or money/sell theirs or others' items for money

In older children, signs of grooming can easily be mistaken for 'normal' teenage behaviour, but you may notice unexplained changes in behaviour or personality, or inappropriate sexual behaviour for their age. See the NSPCC website for further information about grooming.

Q Radicalisation

For more information, please see the Preventing Extremism and Radicalisation Policy.

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

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

Extremism is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs

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

Children can be vulnerable to the influences of extremism which could lead to radicalisation. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology and/or radicalisation. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).Increasingly the preferred pathway for those wishing to radicalise others is by online methods.

It is possible to protect pupils from extremist ideology and intervene to prevent those at risk of radicalisation from being drawn into terrorism. As with other safeguarding risks, staff should be alert to changes in pupil's behaviour, which could indicate that they may be in need of help or protection.

Staff should use their judgement in identifying children who might be susceptible and at risk of radicalisation and act proportionately which may include the DSL/Preventing Radicalisation lead making a referral to the Channel Panel in their local authority. Channel panels, established under the Counter-Terrorism and Security Act 2015, arrange for support for individuals who have been assessed as vulnerable to being drawn into terrorism.

Signs and Indicators

There are no known definitive indicators that a child/young person is susceptible or vulnerable to radicalisation, but there are a number of signs that t*ogethe*r increase their risk of being groomed in this way.

These include, but are not limited to:

- Under/over achievement changes
- Being in possession/sharing extremist literature
- Poverty
- Social exclusion/isolation and need for belonging
- Traumatic events – current and/or historical in earlier childhood
- Global or national events (may or may not involve any personal link/association with a particular country)
- Religious conversion/changes in practice and/or belief structure
- Change in behaviour (verbal, physical, emotional, social)
- Exploitation of some form
- Extremist influences
- Conflict with family over lifestyle
- Confused identity/sense of self
- Victim or witness to race or hate crimes
- Rejection by peers, family, social groups
- Having confirmed or emerging indicators of SEND

R Adverse Childhood Experiences

An Adverse Childhood Experience (ACE) is a stressful event in childhood (note: a child is up to 18 years) that can have a lasting impact on mental health, behaviour, and education throughout childhood, adolescence and into adulthood. An ACE can mean that a child has already been a victim of abuse, neglect, and/or exploitation, or growing up in a household in which alcohol or substance misuse, mental ill health, domestic violence and/or criminal behaviour are present. ACEs can affect brain development, increase the risk of chronic health conditions, mental illness, and substance abuse in adulthood. Recognising and preventing ACEs is therefore crucial for promoting child well-being and reducing the long-term impact of these experiences.

Resources

ACEs (Adverse Childhood Experiences) - Early Education

A practical handbook on Adverse Childhood Experiences (ACEs) Delivering prevention, building resilience and developing trauma-informed systems: A resource for professionals and organisations - World Health Organization Collaborating Centre On Investment for Health and Well-being

Understanding trauma and adversity | Resources | YoungMinds

The Little Book of Adverse Childhood Experiences | National Education Union

Trauma and child brain development training | NSPCC Learning

S Mental Health

Please see Part 3- Process for more information in relation to managing situations involving mental health.

Mental Health is defined as a 'state of wellbeing in which every individual recognises his or her potential, can cope with the normal stresses of life, can work productively and fruitfully, and is able to make a contribution to his or her own community' (World Health Organisation).

Positive mental health is important to build strong, resilient and proactive children. We know that some children will encounter some level of challenge in life, but for many children, they will face adversity, with some experiencing trauma or abuse (see above) which may impact on their mental health. For many young people, adolescence is particularly a time of stress, whilst for others transitioning through the school years can also be problematic.

For those pupils who may begin to struggle with their mental health, a school intervention may provide a turning point in their lives, may mitigate the issues that are negatively impacting on their mental health, and ultimately may prevent mental ill health in adulthood.
It is important to note that there have been many changes in the kinds of pressures and difficulties that children now encounter to what has gone before. What seems apparent, however, is that there has never been a time when children have needed our support more in terms of their mental health.

Contributing factors

There are various contributing factors to the rise in mental health issues, the most common being:

- lack of family support and unrealistic parental expectations
- peer relationship problems and bullying
- feeling unhappy about appearance
- pressures around drugs and alcohol
- excessive screen time
- excessive dieting/exercise
- quarrelling with parents, the breakdown of the family unit and parental conflict

Vulnerabilities

Certain groups of children may be more vulnerable to having poor mental health, and we also know that there are certain risk factors that could increase their likelihood of having poor mental health. Therefore, it seems logical that these types of children and young people may be most likely to display emerging indicators, and subsequently they could be more easily identifiable.

Research suggests that children's vulnerabilities can be categorised into nine broad categories:

1. Children receiving statutory support including those in care
2. Children known to have experienced abuse, neglect and/ or exploitation
3. Children with a disability or ill-health or developmental difficulties

4. Children in households characterised by poverty or domestic abuse
5. Children who are vulnerable by virtue due to their nationality
6. Children who are vulnerable by virtue of their identity e.g. LGBTQ+ and/or questioning their gender
7. Children at risk in relation to activity or institutions outside of the home e.g. gangs or radicalisation
8. Children caring for others, e.g. their parents due to illness
9. Children with medical conditions

Our approach

The school will have a whole school approach to mental health and wellbeing. This means that we:

- have a culture and environment that promotes positive mental health and wellbeing to prevent the onset of mental illness
- raise awareness of emotional wellbeing and mental health issues, and reduce stigma
- ensure that all school staff know every pupil in the round, including their physical/mental health
- observe pupils and identify early those who may be experiencing physical/mental health problems or be at risk of developing one
- upskill staff so they can respond to pupil's physical/mental health needs should they arise
- ensure that we implement both early targeted support and school-wide interventions to help pupils build resilience
- liaise with and refer pupils to specialist services where needed
- make sure that pupils and their parents/carers are aware of, and able to access, a range of external mental health interventions
- are committed to pupil and parent/carer participation in decision making
- deliver high quality teaching to pupils around mental health and wellbeing

Mental Health and Safeguarding

All staff must be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm (see below), suicidal ideation or risk of suicide (see below). They could also be an indicator that a child has suffered, or is at risk of suffering abuse, neglect or exploitation. It is the responsibility of all staff to recognise when a pupil shows signs of distress or presents with mental health concerns which need the intervention of the DSL within their safeguarding capacity.

Our staff understand that the 'contextual safeguarding model' and knowing about the 'bigger picture' of pupil's lives including their family circumstances, will help them identify any social, emotional, and mental health needs.

If a pupil is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and/or making plans to end their life, there are potential warning signs which staff are well placed to recognise:

- Significant changes in behaviour
- Ongoing difficulty sleeping
- Withdrawing from social situations
- Not wanting to do things they usually like, and
- Physical signs of self-harm or neglecting themselves

Not every child who exhibits these behaviours is suicidal or has a mental health concern.

Whilst only appropriately and medically trained professionals should attempt to make a diagnosis, staff are well placed to identify those whose behaviour suggests that they may be experiencing a mental health problem, or be at risk of developing one, and/or contemplating suicide. Staff can offer immediate support and vital early intervention.

If staff have a concern about a pupil's mental health, they must raise this with the DSL or DDSL.

If a pupil self-harms or expresses suicidal ideation or attempts to end their life whilst in school, they must be 100% supervised by staff, whilst another member of staff informs the DSL immediately and verbally. Providing medical care must be the priority.

If the school considers a pupil is in immediate medical danger, they should call 999 and request an ambulance, and the parents/care must be notified immediately.

For other situations, the school can also get help from NHS 111 online or call 111 and select the mental health option whilst contacting the parents/carers. More information around process can be found in Part 3

Self-harm

What is self-harm ?

Self-harm 'describes any way in which a young person might harm themselves or put themselves at risk, in order to cope with difficult thoughts, feelings or experiences (No Harm Done 2017). The clinical definition of self-harm also includes attempted suicide, though some argue that self-harm only includes actions which are not intended to be fatal. Some people who self-harm may be suicidal, but it is widely accepted that self-harm is often used as a way of managing difficult emotion without it being a suicide attempt. However self-harming can result in accidental death, so every episode must be taken seriously to avoid escalation or fatality.

Why do children self-harm?

- To manage extreme emotional upset
- To reduce tension
- To provide a feeling of physical pain to distract form the emotional pain

- To express emotions such as hurt, anger or frustration
- As a form of escape
- As an effort to regain control over feelings or problems
- As an attempt to punish themselves or others
- To elicit care from others
- To identify with a peer group

How do children self-harm?

- Self-cutting, scratching, scraping or picking skin
- Swallowing inedible objects, hazardous materials or substances
- Taking an overdose of non-prescription or prescription drugs
- Hitting or banging head or other parts of body
- Intentionally taking too little or too much medication
- Burning or scalding
- Hair pulling
- Hanging
- Suffocation or self-strangulation
- Scouring or scrubbing excessively
- Self-poisoning
- Use of illegal drugs and excessive amounts of alcohol.

Staff or parents/carers may also notice in the child:

- Changes in eating/sleeping habits
- Increased isolation from friends, becoming socially withdrawn
- Changes in activity and mood
- Lowering of academic achievement
- Talking or joking about self-harm and suicide
- Abusing drugs or alcohol
- Expressing feelings of failure, uselessness or loss of hope
- Changes in clothing e.g. always wearing long sleeves
- Unwillingness to participate in certain events e.g. swimming
- Increased time spent online

Resources

The Department of Education has published advice and guidance on Preventing and Tackling Bullying, Mental Health and Behaviour in Schools, and ‘Every interaction matters’. The latter is a pre-recorded webinar which provides staff with a simple framework for promoting wellbeing, resilience, and mental health.

In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance, Promoting Children and Young People's Emotional Health and Wellbeing. Its resources include social media, forming positive relationships, smoking and alcohol. See Rise Above for links to all materials and lesson plans.

Child mental health: recognising and responding to issues | NSPCC Learning

Papyrus is a national charity dedicated to the prevention of suicide offering training, resources, information and advice for all. www.papyrus-uk.org Hopeline: 0800 068 4141

Alumina offers free online support for 10–17-year-olds

www.samaritans.org Telephone: 116 123 (anytime) Email: jo@samaritans.org

www.youngminds.org.uk Phone: 0808 802 5544 (weekdays 9.30am-4pm)Where the school already has access, they may seek advice from their Mental Health Support Team (MHST), which are in the process of being rolled out to all schools.

The NHS Every Mind Matters website also contains helpful information and advice about looking after a child's mental health: https://www.nhs.uk/every-mind-matters/supporting-others/childrens-mental-health/.

In addition, the Hub of Hope is the UK's leading mental health support database. It brings local, national, peer, community, charity, private and NHS mental health support and services together in one place, so that anyone struggling can find the most appropriate support.

T Children who may have specific vulnerabilities

Essential points

Some children are potentially at greater risk of harm and early help and support is required.

Whilst all children should be protected, it is important that staff recognise that some groups of pupils are potentially at greater risk of harm (including online harm), especially those with protected characteristics protected characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation).

This policy will now consider 11 specific groups of children who may have increased vulnerability.

1. Children with additional learning needs, and/or disabilities, and/ or medical/ physical health conditions
2. Children who are LGBTQ+ (or perceived by others to be)
3. Children who are questioning their gender (or perceived by others to be)
4. Children who have a family member in prison
5. Children who have involvement within the court system

6. Children who are absent from education and Children Missing Education
7. Children who have a Social Worker
8. Children who cannot be looked after by their parents
9. Children who live in a home environment where there is domestic abuse (see above section B)
10. Children requiring mental health support (see above Part 2: Section S)
11. Children who are young carers

1 Children with additional learning needs and/or disabilities, and/or medical/physical health conditions

Children with additional learning needs and/or disabilities, and/or certain medical or physical health conditions* can face additional safeguarding challenges, and are statistically more vulnerable to child abuse, including child-on-child abuse. Additional barriers can exist when recognising abuse and neglect in this group of children. These include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- that these children can potentially be disproportionately impacted and more prone to peer group isolation, or bullying than other children (including prejudiced based bullying) without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges which creates a risk that they do not understand the difference between fact and fiction in online content and then repeat the content/behaviours in school or the consequences of doing so.

Any safeguarding concerns, including reports of abuse around this group of pupils will usually require the DSL to liaise with the SENCO (and school nurse where appropriate). Extra pastoral support may be needed for these pupils, along with ensuring that any appropriate support for communication is in place.

*A child having a medical/physical health condition (including allergies and conditions requiring delegated healthcare tasks) is not in itself an indicator that a child is at greater safeguarding risk. In the event of a clinical incident taking place, the school nurse/equivalent, in conjunction with the DSL, should consider whether any safeguarding duty has been triggered and whether any further action is required based on the nature of the incident. A safeguarding referral would only be needed where an incident highlighted concern that the pupil be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition. This might occur where relevant information about a pupil person's medical condition is not provided to the school, or where they are repeatedly sent without essential medication, thereby putting the individual at risk.

Resources

SEND Code of Practice 0 to 25 years, and

Supporting Pupils at School with Medical Conditions and Allergy safety in schools

The Special Educational Needs and Disabilities Information and Support Services (SENDIASS).

Mencap - Represents people with learning disabilities, with specific advice and information for people who work with children and young people

NSPCC - Safeguarding children with special educational needs and disabilities (SEND) and

NSPCC - Safeguarding d/deaf and disabled children and young people

2 Children who are lesbian, gay, or bisexual/other in sexual orientation

A child or young person being lesbian, gay, or bisexual (or other) is not in itself an inherent risk factor for harm, however, they can be more vulnerable to discriminatory bullying targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (or other) in sexual orientation (whether they are or not) can be just as vulnerable as children who are.

Whether a child is, or perceived to be lesbian, gay or bisexual (or other), any risks can be compounded where children lack trusted adults with whom they can be open. The school will take proactive steps to prevent all bullying (including putting appropriate sanctions in place), and support those at increased risk. Our school is an inclusive environment where all pupils belong, and all pupils are encouraged to seek support when, and if, they require this. It is therefore vital that our staff endeavour to reduce the additional barriers faced by these potentially vulnerable groups of pupils and maintain a culture where pupils can speak out or share their concerns with members of staff.

3 Children who are questioning their gender

Introduction

In recent years, nationally in the UK, there has been a significant increase in the number of children who are questioning the way they feel about being a boy or a girl, including the physical attributes of their biological sex, and the related ways they fit into society.

It is common for children to engage in activities that are less typically associated with their sex. For example, at primary school age, girls may play with trucks, or boys may dress in clothes that are perceived as feminine. Sometimes young children also go through a period of questioning their gender but for the majority this will not continue into adulthood, while a small proportion may continue to question their gender and this feeling may intensify into puberty.

The school will take the necessary time to understand the thoughts and feelings of any pupils who are questioning their gender and staff should be appropriately professionally curious about the full

range of the pupil's experiences. Staff should remain aware of the potential vulnerabilities of pupils who are questioning their gender, including the possibility of complex mental health and psychosocial needs, for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying.

That said, it is not for schools to take action in this area (KCSIE).

Legislation

In making decisions about supporting social transition, the school must comply with the distinct but interacting obligations under safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination* in informed by their evaluation of the welfare and best interests of the pupil and the other pupils.

In line with the responsibilities of schools to adhere to the highest standards of safeguarding for their pupils, alongside obligations under the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014, schools must not allow pupils into toilets, changing rooms, or boarding or residential accommodation designated for the opposite sex, with no exceptions**. Similarly, where schools have implemented single-sex sports as being necessary for safety reasons, there should be no exceptions and pupils must not be allowed to participate in sports designated for the opposite sex.

*Schools must ensure that they do not discriminate against pupils with the protected characteristic of gender reassignment when taking decisions in this area. Some pupils who are questioning their gender may not have the protected characteristic of gender reassignment. In practice, it may be very difficult for a school to determine whether a pupil questioning their gender has this protected characteristic or not.

***See above for more information on toilets, changing /showers rooms, and residential accommodation.*

Recording

All decision making around any individual pupil who is questioning their gender must be recorded (this would usually be on their ECMS). Recordings must include the pupil and parent/carer's voice in terms of wishes and feelings.

Decisions

Decisions must be made in line with the following principles, as outlined in KCSIE:

1 Schools have statutory duties to safeguard and promote the welfare of all children

The school will consider how best to fulfil their statutory duties towards a pupil who is questioning their gender, as well as their peers, ensuring that any agreed course of action takes account of the impact on all of those affected. This means that the first step when considering a pupil's/parent's request for support with social transition will be to consider what is in the best interests of the pupil and other pupils, and a decision relating to social transition may not be the same as a pupil's wishes. The school will work with parents/carers to determine what is in the best interests of their child as

well as considering any clinical evidence or advice and seeking any additional non-clinical professional advice where relevant (for example the SENCO), including involving the DSL. The school will consider everything that could be affecting a pupil, including whether they have any wider health issues or neurodiversity. In considering the best interests of pupils, the school will take into account the principle of taking 'a careful approach' (see below point 3).

Schools should be particularly conscious of safeguarding concerns relating to primary aged children. For example, the Cass Review (2024) noted evidence that children who socially transition before puberty – and those who transition prior to receiving clinical advice – are more likely to proceed to a medical pathway than those who do not. Schools should also keep in mind that some children who socially transition before puberty will be "living in stealth" meaning other pupils and/or staff may be unaware of their biological sex, and schools should be aware of related safeguarding concerns (see below section on living in stealth).

Schools should keep in mind the emphasis in the Cass Review on early clinical involvement when families are considering social transition for pre-pubertal children, including how to support their children in a non-directive way, whilst also keeping options open and flexible. The Cass Review emphasised that clinical involvement in the decision-making process should include advising on the risks and benefits of social transition as a planned intervention, referencing best available evidence.

This is not a role that can be undertaken by school staff.

2 Parents/carers should be actively involved and their views treated with importance

Parents/carers have the leading role in the lives of their children, and this area should be no exception. Therefore, where a pupil who is questioning their gender asks for support from the school, we will engage parents/carers as a matter of priority and treat their views with importance.

The Cass Review is clear that outcomes for children and adolescents are best if they have a supportive relationship with their families and, in the vast majority of cases, the school will work together with parent/carers to establish what is best for the pupil. Involving a pupil's parents/carers will enable the school to promote a pupil's wellbeing and protect them from harm.

The school will explore how best to support these conversations, including offering a staff member to be present or to speak to parents/carers on the pupil's behalf. However, in the rare circumstances where involving parents/carers would constitute a greater risk to the pupil than not involving them, the school will involve their DSL to determine what action is needed to safeguard the pupil, before the parents/carers are contacted or any decisions are taken. This may involve contacting the local authority children's Social Care.

The advice above applies in cases where a pupil has requested support with social transition. In cases where a pupil confides in a member of staff about their feelings but does not ask the school to make changes to how they are treated, there is no reason to break any confidence unless there is a related safeguarding risk.

3 *Accommodating social transition is an active intervention so schools must take a very careful approach*

In line with government advice, the schools will take a very careful approach in relation to social transition. The Cass Review acknowledged that there is a lack of good evidence on the long-term impact of social transition on young people, but it is clear that social transition should be viewed as an active intervention that may have significant effects on the child or young person in terms of their psychological functioning and longer-term outcomes. Primary schools should exercise particular caution, and support for full social transition to be agreed very rarely. The Cass Review acknowledges that older children will generally have greater agency to make their own decisions. Maintaining flexibility and keeping children's options open will help to avoid a child feeling they are under pressure to commit to a potentially irrevocable pathway when they are young. Parent/carers will be signposted to their GP as the first step.

4 *Discussing constraints*

Where the school's policy has the potential to place a pupil who is questioning their gender at a disadvantage (and other pupils, including those who are also questioning their gender), the school will balance the impact of agreeing the pupil's request against the impact of refusing their request, considering all the relevant factors. This will include taking into account the school judgment about whether supporting social transition is in the pupil's best interests and the best interests of other pupils, as above. The school will explain to the parents/carers any constraints.

When discussing requests with pupils and their parents/carers, the school will take time to sensitively explain that supporting any degree of social transition will not include allowing access to toilets, changing rooms or residential accommodation (i.e. on educational visits/trips) designated for the opposite sex, and will not include allowing children to join PE classes designated for the opposite sex where there are safety reasons for single-sex PE. The government guidance states that there must be no exceptions.

The school will also make sure that pupils and their families are aware that while the school will appropriately sanction any cases of bullying or harassment, and take a strong stand against bullying, the school must also be conscious of the rights of pupils and staff in relation to their religion or belief. However, schools supporting social transition will consider discussing options with pupils and staff such as using names instead of pronouns.

5 Reviews

The circumstances and/or needs of a pupil may change over time. For example, it may become known that there are safeguarding issues that were not previously apparent (including where a pupil is 'living in stealth' - see below), or that a decision has placed an unsustainable pressure on a school's resources. In such cases, the school may need to review their original decision taking into account the factors set out above, including involving the pupil's parents/carers. In deciding whether to review a decision, the school will involve their DSL.

As well as revisiting decisions at appropriate points, the school will need to consider whether previous decisions taken (prior to the new KCSIE coming into force) remain appropriate, taking into

account the impact of making any changes on the pupil in question and considering the principle above about involving parents/carers.

6 Correct information

Having the correct information about a pupil is important in the context of schools fulfilling their safeguarding duties, and they should make sure all relevant staff are aware of a pupil's biological sex in all cases.

Schools are legally required to record a pupil's biological sex accurately.

7 Pupils 'living in stealth'

The school will be particularly conscious of the vulnerabilities of pupils who have fully socially transitioned from an early age but may be 'living in stealth' (i.e. the school, friends/staff may be unaware of the pupil's biological sex). The Cass Review emphasised that these children are likely to approach puberty in a fearful and anxious state. Schools will involve the DSL in these cases. The school encourages parent/carers to be open about such cases so their child can be fully supported.

8 *Support for pupils who wish to detransition*

There may be circumstances where a pupil wants to fully or partially reverse a request that has previously been agreed. The Cass Review highlighted the importance of maintaining flexibility and keeping options open for children who have socially transitioned and recommended that support should be provided to children who wish to de-transition. If this situation arises, the school will work closely with the pupil and their parents/carers (and relevant experts as needed) to ensure that pupils in this position are supported.

Teaching pupils around gender

Please refer to our RSE Policy for more information and above in the section Teaching Pupils about Safeguarding.

The school will be mindful that beyond the facts and the law about biological sex and gender reassignment there is significant debate, and they should be careful not to endorse any particular view or teach it as fact. For example, they will not teach as fact that all people have a gender identity. The schools will avoid language and activities which repeat or enforce gender stereotypes and will be mindful to avoid any suggestion that social transition is a simple solution to feelings of distress or discomfort.

When using external resources, the school will avoid materials that use cartoons or diagrams that oversimplify this topic, that could be interpreted as being aimed at younger pupils, or that perpetuate stereotypes or encourage pupils to question their gender. The school should consult parents/carers on the content of external resources on this topic in advance and make all materials available to them on request as set out in the section on openness with parents/carer

4 Children with family members in prison

Approximately 193,000, children in England and Wales have a parent currently in prison (KCSIE 2026)

Schools should be aware and provide additional support if they have any pupils on their roll whose parent or close family member is moving through criminal proceedings, and/or in prison.

Many children with a parent in prison go on to lead positive and fulfilling lives. However, a range of research shows that this group of vulnerable children are more likely to have poorer outcomes, including, but not limited to poverty, stigma, isolation, homelessness and mental health problems. Crucially they are more likely to become involved in crime, be absent (or excluded) from school, and to experience drug and alcohol misuse. The Prisoner Families Helpline provide information designed to support professionals working with offenders, parents/carers and their children, to help mitigate negative consequences for those pupils who require stability and sensitive support

5 Children involved in the court system

Criminal courts

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children 5-11-year-olds and 12-17-year-olds. The guides explain each step of the process, support and special measures that are available.

Family Courts

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be extremely stressful for children caught up in proceedings, and in the most complex situations, cause significant emotional abuse to the child when exposed to parental conflict that is frequent, intense and unresolved (see above). In these situations, after speaking to both parents about the situation and the impact on their child, a referral to local authority children's Social Care may be made if the situation does not improve in a timely manner.

The Ministry of Justice (UK) has launched an online child arrangements information tool with clear and concise information for on the dispute resolution service. This may be useful for staff, parents, and pupils.

Court Orders

Where pupils are involved in the above family courts, the school has a duty to support any court order granted and cannot become involved in individual discussions with parents around court decisions around collections/residence. It is the parents' responsibility to adhere to the directions in any court order; therefore, it will be themselves who potentially breach it. Those with Parental Responsibility must seek permission from the courts to disclose any variation to orders with the school.

6 Children Absent from Education and Children Missing Education

Please see our Child Absent in Education, Children Missing Education, and Attendance Policy for more information.

It is mandatory for all children of statutory age to attend school every day that the school is open. However, our attendance policy also applies to all pupils in the Early Years (EYFS 2025).

All staff should be aware that pupils who are absent from education for unexplainable, and/or prolonged periods and/or on repeat occasions, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in County Lines. It may indicate mental health difficulties, risk of substance abuse, risk of travelling to conflict zones, risk of Female Genital Mutilation and/or risk of forced marriage.

It is important that the school's response to unexplainable, prolonged and/or persistently absent pupils 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 first emerge. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a pupil being absent from school or going missing in future

Where pupils are already known to external agencies, where being absent from education may increase known safeguarding risks within the family or in the community, or where there is prolonged absence and/or unexplained absence for any pupil, the school will request that the parents/carers facilitate regular visibility of the pupil remotely, over MS Teams. Where the parents/carers do not comply with this request, the school will follow the DfE statutory guidance on school attendance Working Together to Improve School Attendance which sets out how schools must work with local authority children's services where school absence indicates safeguarding concerns.

Children Missing Education are **not** those who are registered at a school, even if they are persistently or severely absent from that school,

CME are children who

- are in the process of applying for a school place
- have been offered a school place for a future date but have not yet started
- are receiving elective home education (EHE) that has been assessed as unsuitable
- have been recorded as CME for an extended period, for example where their whereabouts is unclear or unknown

Staff should be aware of their school's unauthorised absence and their local authority's 'children missing/absent from education' procedures. Information regarding schools' duties regarding pupils absent/missing education, including information schools must provide to the local authority when removing a pupil from the school roll at standard and non-standard transition points, can be found in the department's statutory guidance: Children Missing Education.

Elective Home Education

Many home-educated children have an overwhelmingly positive learning experience. Most parents/carers decide to home educate with their child's best education at the heart of their decision. However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.

Where a parent/carer has expressed their intention to remove a pupil from school with a view to educating at home, the school will coordinate a meeting with parents/carers where, and as soon as possible. It is recommended that a professional from the local authority also attends this meeting. 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 the pupil, and the school has had ample opportunity to listen to the underlying reasons for the absence/wish to remove the pupil from the school; supportive interventions will be offered. This is particularly important where a pupil has SEND, is vulnerable, and/or has a Social Worker.

Should there be existing safeguarding concerns about any pupil whose parents/carers state they are planning to educate them at home and/or the removal from the pupil to home educate may be a concern, a referral to Social Care may be considered.

Schools must notify the local authority CME department of a child's removal from the school roll at a non-standard transition point, and they should also share information on a child's circumstances, especially if already known to children's Social Care or if they have an EHC plan. The local authority has a duty to intervene where a home educated child is not being suitably educated, or is not safe, and in such cases the local authority must act to remedy the situation.

7 Children who have a Social Worker

Children may need a Social Worker (local authority children's Social Care) due to safeguarding or welfare needs (see below). Children may need this help due to abuse, neglect, and/or exploitation and/or complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and positive mental health.

8 Children who cannot be looked after by their parents

This policy will explore the following scenarios:

A. Kinship care, including children who are being privately fostered

B. Children who are looked after (or previously looked after, including Care Leavers)

C. Children who are staying with host families

D. Children who on a sponsored visa

A Kinship care, including children who are being privately fostered

Kinship care is when a child lives full-time or most of the time with a relative, friend or connected person and that person provides most or all of the child's care. It does not include parents, foster carers with no prior connection to the child, or anyone caring in a professional capacity.

Kinship care arrangements can be formal (through legal orders or kinship fostering) or informal (family or friends caring without a formal agreement in place).

The following are all types of kinship care arrangements however this list is not exhaustive:

a) informal kinship arrangements (no approved foster care) including

   i. A private family arrangement in which a close family member who does not hold parental responsibility raises the child

      - and the local authority has had no major role in making the arrangement for the child
      - where a Family Court has not made an order in respect of the care of the child.

   ii. Where a child under the age of 16 is being provided with accommodation for less than 28 days by an individual in their own home who is not a close relative

   iii. Where a 16- or 17-year-old is being provided with accommodation by an individual who is not a close relative in their own home

b) A private fostering arrangement in which someone who is not a close relative of the child looks after the child for 28 days or more (as per section 66(1)(a) and (b) of the Children Act 1989 (see more information below about private fostering)

c) Where a 'lives with' child arrangements order' has been granted in respect of the child, in favour of someone who is a friend or family member but is not the child's parent.

d) Where a special guardianship order has been granted appointing a friend or family member as the child's special guardian.

e) Where a child is a 'looked after child' by virtue of either an interim or final order or being accommodated by the local authority (usually under section 20 of the Children Act 1989) and each of the following apply (this may be described as 'kinship foster care' or 'family and friends foster care'):

   i. The child is being cared for by a friend or family member who is not their parent, and

   ii. The friend or family member is a. approved as a local authority foster carer on a temporary basis or following full assessment.

f) Where an adoption order has been granted in respect of the child and, prior to the making of the order, the adopter was a friend or family member.

Private fostering

Private fostering is when a child or young person *under 16 years old* (or 18 if they have a disabilityis looked after for 28 days or more by someone who is not a close relative, legal guardian, or person with parental responsibility. Close relatives *only* include parents, step-parents, aunts, uncles, and grandparents.

It is not private fostering if the child is 'looked after' by the Local Authority (see above -also known as 'in foster care' and which includes placement in residential care, with an approved foster carer or a 'kinship' carer).

Private fostering occurs in *all* cultures, including British culture, and children may be privately fostered at any age.

Examples of private fostering situations include:

- children and young people living apart from their families for a variety of reasons e.g. a parent is ill, has had to temporarily move for work, or there has been conflict, separation or divorce;
- children whose parents work or study elsewhere in the UK or overseas;
- children sent to this country by their parents for education and health care;
- young people living with the family of a friend; and
- children on holiday exchanges

People become private foster carers for all sorts of reasons. Private foster carers can be a family friend, or someone who is willing to care for the child of a family they do not know, for example host families supplied by a Guardianship Organisation (see below). If a host family is going to be caring for a child for 28 days or longer, they are classed as private foster carers, and the Local Authority must be notified.

Why does your Local Authority Children's Services need to know?

By law, the Local Authority must be informed about all private fostering situations. The pupil's parents, private foster carers, and anyone else involved in the arrangement or who becomes aware of the arrangement, e.g. guardianship agencies, schools or health professionals are *legally required* to inform Children's Services. Children's Services have a legal duty[10] to make sure all private fostering arrangements are safe for the child.

Once informed of the arrangement, they will check the suitability of private foster carers, make regular visits to the child, and ensure advice, help and support is available when needed. Where a member of staff becomes aware that a pupil may be in a private fostering arrangement, they should

[10] Section 67(1) of the Children Act 1989 amended by the children Act 2004) and the Children (Private Arrangements for Fostering) Regulations 2005

raise this with the DSL. Where Children's Social Care are not already aware of the circumstances, the DSL should make a referral to them, after making enquiries with the family about the arrangement.

Timescales for informing the Local Authority

The child is not yet living with the private foster carers	Within 6 weeks beforehand
The child will move in with the private foster carers within 6 weeks	Immediately
The child is already living with the private foster carers.	Immediately

Resources

https://www.gov.uk/government/publications/national-minimum-standards-for-private-fostering

B Children who are Looked After (CLA/LAC) (and Previously Looked After Children including Care Leavers)

The most common reason for children becoming looked after is as a result of abuse, neglect and/or exploitation. A child who is being 'looked after' by their Local Authority is usually known as a 'Child in Care' or a 'Looked After Child' (or Child Looked After-CLA). They might be living with foster parents or at home with their parents under an Interim Care Order (Children Act 1989) granted to Social Care, or in residential children's homes, or other residential settings like schools or secure units.

A child who is *adopted* is **not** a Looked After Child. Occasionally, in rare circumstances, children are placed into Local Authority foster care under an Interim Care Order when an adoption breaks down and the adoptive parents relinquish the child. Once a Full Care Order is agreed, the child remains on long term foster care. The previously adoptive parents may or may not have continued contact with the child, depending on the situation and the emotional impact on the child.

In any situation involving care proceedings, an Interim Care Order (under section 31 of the Children Act 1989) will remain in place until those proceedings are concluded (within 26 weeks in most authorities). At the conclusion of care proceedings in any situation, the child will either stay in long term foster care (under a Full Care Order granted to the local authority under section 38, Children Act 1989) until they reach the age of 18 years, return to their parents (usually under a Supervision Order), reside with other family members/friends (usually under a Special Guardianship Order), or in some cases be adopted, when an Adoption Order is granted. In all of the latter situations, it is often usual for parents to have agreed supervised contact arrangements with their child, most

commonly one, twice or three times per year, unless there is risk posed to the child. Some parents are granted non-direct written contact; this is often referred to a 'letterbox contact'.

A child may also have been placed in local authority arranged care **voluntarily** by their parents who are struggling to manage their children's behaviour 'beyond parental control' or meet their child's needs due to their own illnesses or disabilities (under section 20, Children Act 1989). In these cases, rehabilitation will always be the aim, but if this is not possible, the Local Authority will apply for an Interim Care Order and finally a Full Care Order. Usually, these parents will have continued contact with their child throughout proceedings, and often after they have concluded

As a result of their experiences both before and during care, Looked After Children are at greater risk than their peers; they are, for example, four times more likely than their peers to have a mental health difficulty. Providing a secure, caring environment in school and enabling such children to develop strong, trusting, and stable relationships with professionals is critical to their immediate and longer-term safety and wellbeing.

Similarly, a previously looked after child (whether in care temporarily or longer term into adoption, including a Care Leaver (see below)) also potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, including care leavers, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

Cognita ensures that the Designated Teacher for Looked After Children receives training, including on the reasons why children become looked after, their legal status, the support that staff can provide to keep such pupils safe and the ways in which they can maximise educational stability for Looked After Children (see above).

The Designated Teacher for Looked After Children (and 'previously' Looked After Children, and care leavers), in collaboration with the DSL is responsible for:

a) ensuring that any 'looked after' pupils, plus previously looked after, including care leavers, are adequately supported by staff in school
b) has contact details of the pupil's Social Worker (Personal Adviser for care leavers) and the name and contact details of the Virtual School Head* for children in care
c) ensures that relevant staff members have sufficient information about the pupil's looked after legal status and care arrangements;
d) works with the Virtual School Head to discuss how staff can best support and promote the educational progress and achievement of 'looked after' pupils, previously looked after pupils in the school, and care leavers, and meet the needs in the looked after pupil's LAC Plan, and Personal Education Plan; and
e) attends Looked After Children reviews and other meetings they are required to attend.

Statutory guidance: Designated teacher for looked-after and previously looked after children contains further information on the role and responsibilities of the designated teacher.

*Virtual School Heads have responsibilities towards children who have left care through adoption, special guardianship, or child arrangement orders or who were adopted from state care outside England or Wales. Their primary role for this group will be the provision of information and advice to relevant parties. In addition to their statutory duties, the role of Virtual School Heads was extended in June 2021, to include a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker.

In September 2024, the role of Virtual School Heads was further extended to include a non-statutory responsibility to promote the educational achievement of all children in kinship care. Non-statutory guidance on Promoting the education of children with a social worker and children in kinship care arrangements contains further information on the roles and responsibilities of Virtual School Heads.

Care Leavers

A Care Leaver is referred to in legislation as a 'relevant child', and is defined in section 23A(2) of the Children Act 1989 as a child who is

(a) not looked after

(b) aged 16 or 17, and

(c) was, before ceasing to be looked after by a local authority, looked after for a period of 13 weeks, or periods amounting in total to 13 weeks, beginning after they have reached the age of 14 and ended after they have reached the age of 16.

The Designated Teacher for Looked After Children and the DSL must have details of the local authority Personal Advisor appointed to guide and support any pupil who is a Care Leaver, and should liaise with them as necessary regarding any issues of concern affecting the pupil.

Adoption

A child who is *adopted* is **not** a looked after child. Adoption occurs when the biological parents relinquish their parental rights, and the adoptive parents become the child's legal guardian and caretaker. The state in which the child is being adopted will require a series of background checks, licensing, and 'check ins' of the adoptive parents' home to ensure the child is entering a safe, clean, and accommodating environment. A previously looked after child who eventually becomes adopted potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after pupils safe.

Guardianship

Guardianship is a legal term denoting someone who is appointed by a court order to be a legal guardian of a minor. Typically, if a biological parent is deemed by the courts to be unable to take care of the minor, all of the rights and privileges of a biological parent are transferred to the appointed guardian. Guardianship is different than adoption and is typically temporary. During a guardianship, however, parents can sometimes retain some rights including limited contact with the child. Guardians are overseen by courts, unlike adoptive parents.

C Children who are staying with host families

When might this happen?

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

What is the responsibility of the school?

Schools have a duty to safeguard and promote pupils' welfare as outlined in this policy. This extends to considering their safety and how best to minimise any risk of harm to those pupils during any exchange visit the school arranges, and when organising for the care and accommodation of a pupil with a host family (known as homestays) as part of the exchange.

Suitability of adults in UK host families for homestay arranged by the school

When arranging a homestay, schools should consider the suitability of the adults in the respective families who will be responsible for the visiting child during the stay.

In circumstances where a school arranges for a visiting child to be provided with care and accommodation in the UK (including where they engage a company to make those arrangements) in the home of a family to which the child is not related (including where a person has parental responsibility for the visiting child), the responsible adults will be engaging in 'regulated activity' for the period of the stay. In such cases and where the school has the power to terminate such a homestay, the school would be the regulated activity provider.

A regulated activity provider commits a criminal offence if it knows, or has reason to believe that an individual is barred by the Disclosure and Barring Service (DBS) from engaging in regulated activity but allows that individual to carry out any form of regulated activity.

Private arrangements

Where the child's parent(s) or a student arranges their own homestay themselves, this would be a private arrangement, therefore the school would not be the regulated activity provider. Where it is a private arrangement, the school is not entitled to obtain a standard or enhanced DBS check.

Background checking for adults in homestay arrangements

When a school arranges a homestay, it should consider what intelligence/information will best inform its assessment of the suitability of the adults in those families who will be responsible for the visiting child during the stay. It will be for the school to use their professional judgement to decide what it considers will be most relevant. However, to help inform that assessment, schools should obtain, as a minimum, a DBS enhanced certificate with barred list information.

This check will not only establish whether the adults are barred from engaging in regulated activity relating to children, but where criminal record information is disclosed, it will also allow the school to consider, alongside all other intelligence that it has obtained, whether the adult would be a suitable host for a child.

Volunteer DBS check

DBS enhanced certificates with barred list information for volunteer roles can be obtained free of charge. In respect of an adult who provides UK homestay and receives no remuneration in respect of the stay or where schools reimburse families only for expenses incurred, to enable a DBS application to be considered as a volunteer role, the 'Position Applied For' field will need to make clear that the position is unpaid.

In addition to those engaging in regulated activity, schools are free to decide whether they consider it necessary to obtain a DBS enhanced certificate in respect of anyone aged 16 or over in the household where the child will be staying.

Suitability of adults in host families abroad

It is not possible for schools to obtain criminal information from the DBS about adults who provide homestays abroad. Schools should liaise with partner 'host' schools abroad, to establish a shared understanding of, and agreement to the arrangements in place for the visit. They should use their professional judgement to satisfy themselves that the arrangements are appropriate and sufficient to safeguard effectively every child who will take part in the exchange. Parents must be aware and provide written confirmation of any agreed arrangement. Schools are free to decide whether they consider it necessary to contact the relevant foreign embassy or the High Commission of the country in question to discuss what checks may be possible in respect of those providing homestay outside of the UK.

The school must produce a written risk assessment outlining the approach taken and indicating the reasons for specific decisions. This must include any safeguarding considerations, and individual risk assessments must be created for all vulnerable children (those with a safeguarding (including mental health), SEND, and/or medical need)

During the visit

Pupils must be made aware and understand who to contact during a homestay should an emergency occur, or a situation arises which makes them feel uncomfortable.

Additional action for extended homestays

Where a period of UK homestay lasts 28 days or more, for a child aged under 16 years of age (under 18 years of age if the child has disabilities), this may amount to Private Fostering under the Children Act (1989) (see above). In these cases, the school must notify the local authority of the arrangements. Private fostering legislation places a duty on local authorities to satisfy themselves that the welfare of a child who is being, or proposed to be, privately fostered in their area is being or will be satisfactorily safeguarded and promoted. By notifying the local authority, the school will be assisting the local authority in discharging its duty.

D Children being sponsored - International pupils (Tier 4 child visas)

Cognita acts as a sponsor for international pupils who have Tier 4 visas. The United Kingdom Visas and Immigration (UKVI) have a duty to ensure that all sponsors discharge their responsibility to act in accordance with the immigration rules. As a school we are responsible for ensuring that these pupils are appropriately cared for and that any safeguarding concerns are addressed.

Prior to the pupil arriving at the school, it will be important for the DSL to have knowledge of the pupil's circumstances, including who has parental responsibility, the pupil's care arrangements and contact details for the carer/Private Foster carer in the UK.

Responsibility for each sponsored pupil starts from the moment the Cognita International Recruitment Team assigns the Confirmation of Acceptance for Studies (CAS), i.e. before the pupil leaves their home country and enrolls at the school. The DSL should be aware of the pupil's travel arrangements to the UK.

If the pupil fails to arrive as expected, the school should report this as a matter of urgency to the Cognita International Recruitment Team, who is responsible for checking the pupil has arrived safely on the day of travel and prior to their first day of school. Cognita are responsible from the moment the pupil arrives in the UK. The school needs to complete the enrolment checklist (Appendix F in the UKVI handbook) and upload it to the pupil's file onto the appropriate MS Team. If the pupil does not arrive when expected at the school, the school must notify the International Recruitment Team (IRT) immediately. If the pupil does not arrive within ten working days of the enrolment period, the IRT, in collaboration with the school, must report this to UKVI.

Once the pupil has arrived safely in the UK and the school, the UKVI School Champion, in collaboration with the DSL, will aim to ensure that their needs are met, including pastoral need, and they will liaise with the pupil's parents and/or carers for the ongoing needs of the pupil.

With regards to safeguarding this potentially vulnerable group of pupils, any absences or lack of engagement in study/social activities displayed by them, including failure to return to school after a holiday or break, must be escalated initially to the Regional Safeguarding Lead on the day it occurs. The RSL will escalate the concerns to the Cognita International Recruitment Team (IRT)

as needed (but no later than 5 working days after the event); the latter is obliged to report the pupil to the UKVI if they have ten consecutive unauthorised absences.

It is the school's responsibility to **always** know where these pupils are residing and/or travelling during breaks. In order to have clear visibility of pupils who are being sponsored on a visa by the school, a formal meeting with the pupil's parent/guardians/carers will be arranged if a sponsored pupil's attendance falls lower than 92% and again if it falls below 82%. A record must and will be made of this meeting and agreed action points to improve the pupil's attendance. If a sponsored pupil's attendance ever falls below 80%, Cognita will be required to withdraw sponsorship of their visa, and they will need to leave the UK. It is a requirement of the UK Visas & Immigration (part of the Home Office), that schools demonstrate how they track the attendance of this group of potentially vulnerable pupils. Their attendance must be an agenda point on all safeguarding related meetings.

Changes in circumstances must also be reported immediately to the IRT. These can include:

a. a change in where a pupil studies

b. a change in the pupils' course

c. a change in a pupil's registered address

d. a change in whom the pupil lives with (e.g. from parent to private foster care); or

e. any other circumstance that suggests that they are breaking the conditions of their permission to stay in the UK.

Schools should be proactive in determining whether there has been any change in a sponsored international pupils' circumstances. The school should liaise with the parent(s)/guardians of all sponsored international pupils every term to check whether:

a. the pupil and their parent/guardian's address has changed; or

b. the pupil's childcare arrangements have changed (e.g. moved from living with their parents to a private foster care arrangement)

c. Whether or not the pupil/family have any travel plans, including dates and locations.

Templates are available in the UKVI handbook.

9 Children who live in an environment where there is domestic abuse and/or controlling and coercive behaviours, and CAPVA

(see section B above)

10 Children who require support for their mental health

Please see above section : Part 2: Section S

11 Young Carers

Caring responsibilities can impact on a pupil's attendance, attainment, behaviour and wellbeing. Early identification is essential to ensure young carers receive support, at the right time and by the appropriate services including additional support from external partners, or local authority and health services.

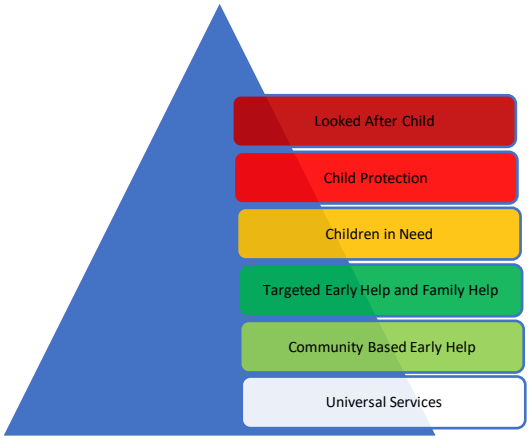
Resources:

Young Carers - Help & Support | Carers Trust
Young carers | Barnardo's
Being a young carer: your rights - Social care and support guide - NHS

U Stages of Safeguarding

The school can use a range of arrangements, depending on the information available and the risk of harm posed to the pupil. The school will always work cooperatively with external agencies, including the local authority children's Social Care and the Police.

The diagram opposite outlines the hierarchy of these approaches.



1. Universal Services
2. Community Based Early Help
3. Targeted Early Help and Family Help
4. Child in Need (s17 Children Act 1989)
5. Child Protection (s47 Children Act 1989)
6. Looked After Child (s31 Children Act 1989)

For further information on the stages, and the role that the school will play, please read WTSC (Ch.3 2026).

Introduction

All families can face challenges that make parenting difficult. Often families are able to overcome challenges themselves or with the help of relatives, friends, and services, such as schools, youth services, health visiting and mental health services as well as local authority support available.

However, sometimes families will have more significant needs that require more intensive help and support.

More generally 'Early Help' refers to support for children of all ages that improves a family's resilience and outcomes and/or reduces the chance of a problem getting worse, and subsequently the risk of harm escalating. Providing early help is more effective in promoting the welfare of children than reacting later when the needs of the child are affecting their health and/or development, or when harm has already occurred and/or there is the likelihood of harm. Whatever their circumstances, pupils and families should not be left waiting to access help and support when issues arise.

The following section will explain the tiered approach support that can be provided.

Universal Services and Community Based Early Help

Universal Services and Community Based Early Help is the term used for support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. It is not an individual service, but a system of support delivered by local authorities and their partners working together and taking collective responsibility to provide the right provision in their area.

This level of support is provided through "Universal services" such as education, health, and other community-based services, as well as support delivered through Best Start Family Hubs, youth services, after school clubs and housing provision. Community Based Early Help will work best when placed alongside school support, preventative education and engagement with parents/carers.

Community Based Early Help and the option to manage the situation internally in school do not need to be mutually exclusive: for example, a school could support the pupil through internal interventions, but still seek support in the community for the family.

Community Based Early help is distinct from Targeted Early Help and Family Help, which are more formal arrangements coordinated by local authorities, where a plan is in place and a Lead Practitioner appointed (see below)

Targeted Early Help and Family Help

Note in KCSIE, Family Help, is taken to mean Targeted Early Help and support and services delivered under s.17 of the Children Act 1989.:

In the UK, local authorities are now required to offer Targeted Early Help services, and some already refer to this now as Family Help. In certain local authorities, the latter will gradually include children given support as Children in Need under s17 Children Act 1989) (see below) with those in non-Social Worker roles e.g. a DSL acting as the Lead Practitioner with oversight from local authority Social Workers.

In line, and in parallel with supporting situations/unmet need internally via school led interventions, the school may decide that, whilst the pupil (s) involved do not require referral to statutory services under s47 (Children Act 1989) (see below) they may benefit from local authority Targeted Early

Help and/or Family Help services Targeted Early Help services delivered through Family Help are coordinated by a local authority and/or their partners to address specific concerns within a family.

Targeted Early Help may be appropriate for pupils and families who have multiple and or complex needs, or their circumstances may make them more vulnerable. This could include where a child is living with wider family members under a kinship arrangement.

It is a voluntary approach, requiring the family's consent.

As this new way of working evolves, it will be vital that all staff:

- are aware of the levels at which service is provided in the various local authorities that the pupils in the school relate to and what these levels are called
- understand the various local authorities' Threshold Documents (see below) and
- know the criteria, including the level of need, for when a pupil should be referred to which service level

As stated above, in the UK, the local authority Targeted Early Help services are now often delivered through what is referred to in WTSC (2026) as 'Family Help', as defined in the Families First Partnership (FFP) Programme Guide. Family Help aims to improve outcomes for children by understanding and responding to their needs, and to the circumstances of their family, as early as possible. It takes place at the heart of communities, bringing together local services under a combined, multi-disciplinary practice approach and service offer.

Child in Need (s17 Children Act 1989)

Many local authorities now combine their Targeted Early Help with Family Help level of service with statutory support under Child in Need (s17 Children Act 1989, see below), the aim of which is to create a more seamless offer for families, with consistent practitioner relationships and a Family Help Plan led by a multi-disciplinary team (see below).

A Family Help plan will be designed together with the pupil and family and updated as the pupil and family needs change.
Some local authorities hold formal multi-agency/organisation Targeted Early Help and Family Help panels to discuss referrals, whilst others have different processes. If parents/carers wish to have further information about this schools' Targeted Early Help and Family help local processes, please contact the DSL for further information.

Threshold Document

It is the responsibility of the local authority Safeguarding Partners to publish a Threshold Document in order to aid the school in knowing when a referral should be made. This document should include:

- the process for accessing universal services and community-based early help, which may include an assessment (see pages 58-61 in WTSC 2026 for more information)

- the criteria, including the level of need, for when a child should be referred to Targeted Early Help and Family Help, which covers non-statutory and statutory support and services provided through:
  - targeted early help under sections 10 and 11 of the Children Act 2004. This support is provided to children and families who are identified by practitioners to have multiple and/or complex needs, requiring a specialist and/or multi-disciplinary/agency response, where statutory support or intervention is not required
  - statutory support, including assessments, delivered under section 17 of the Children Act 1989 (children in need, including how this applies for disabled children)

- the criteria, including the level of need, for when a child should be referred to local authority children's Social Care for assessment and for statutory services under:
  - section 47 of the Children Act 1989 (reasonable cause to suspect a child is suffering or likely to suffer significant harm)
  - section 31 of the Children Act 1989 (care and supervision orders)
  - section 20 of the Children Act 1989 (duty to accommodate a child)

- clear procedures and processes relating to:
  - the abuse, neglect, and exploitation of children inside and outside the home, including online
  - looked after children
  - disabled children

What happens?

If Targeted Early and/or Family Help is felt appropriate for the family, the DSL or DDSL will discuss this with the parents/carers of the pupil, explaining what this support is, and what happens next. The parents/carers must consent to this service as it is voluntary. If a family does not consent to Targeted Early Help and/or Family Help, the school should seek to understand why this is the case, so that they can provide reassurance to the family about their concerns. They should ensure the family has understood the consensual nature of support, and range of services available to meet their needs. The school should consider how the needs of the pupil could otherwise be met, for example, through provision by universal services and/or Community Based Early Help services level (see above).

What happens next?

Once the referral has been made with the parent/carer's consent, the Family Help Team will liaise with the DSL and set up an inter-agency Family Help assessment* (for more information see page 54; WTSC 2026), involving, not only the parents/carers, but their wider family network- making use of family decision making, such as family group conferences, with the aim of meeting the needs of the child (see page 166 of WTSC 2026 for more details). *The school DSL may be appointed as the 'Lead Practitioner' and required to complete this assessment (see below).

Those undertaking this assessment should have consideration for specific needs, including, but not exclusive to, family members who:

- may have learning difficulties/disabilities
- are imprisoned
- have a first language is not English
- may be at risk from hidden harms such as coercive and controlling behaviour, child sexual abuse and 'honour' or faith - or belief-based abuse
- have themselves experienced being in the care system
- young parents
- birth parents who have had children removed from their care
- fathers or male carers
- are LGBTQIA

This should also include where pupils may not view themselves as victims of abuse, such as teenage relationship abuse and child sexual exploitation.

*In some cases, the DSL will act as the 'Lead Professional' and be responsible for:

- co-ordinating support and services for the family
- ensuring the assessment and the Family Help plan responds to identified needs, and
- support the family to co-produce the plan

The Families First Partnership programme guide provides operational details on Lead Practitioner roles and responsibilities, and expectations for coordinating a multi-disciplinary team around the family.

Multi-agency and multi-disciplinary training will be important in supporting this collective understanding of the demographics and needs of the local community, the local practice framework, and the services available to support children of all ages.

Who may need this support?

Any pupil/family may benefit from Targeted Early Help and Family Help, but all school staff need to understand their role in identifying emerging problems and be particularly alert to the ***potential*** need for support for any pupil who:

- is disabled, and/or has certain medical /health conditions and/or has specific additional needs
- has special educational needs (whether or not they have a statutory education, health and care plan)
- has an emerging mental health need/diagnosis
- has been bereaved

- has an ongoing or chronic physical illness
- is a young carer
- is pregnant and/or is a parent themselves
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is involved in the court system; criminal or family court
- is persistently absent from school
- is not in receipt of a full-time education e.g. on a part-time timetable
- is frequently missing/goes missing from care or from home/school
- has relatedly been removed from the classroom, received multiple suspensions, is on a part-time timetable, and is at risk of being permanently excluded from school
- is misusing drugs or alcohol themselves
- is at risk of modern slavery, trafficking, and/ or exploitation (including group-based exploitation)
- is at risk of so called 'honour'-based abuse including Female Genital Mutilation (FGM) and/or Forced Marriage (FM)
- is at risk from being radicalised into terrorism
- is at risk from faith/belief-based abuse
- is in a family circumstance presenting challenges for the pupil/other, such as drug/alcohol misuse/addiction, unmanaged mental health problems, teenage relationship abuse, and/or domestic abuse, including coercive or controlling behaviour and CAPVA
- is experiencing parental conflict that is frequent, intense and unresolved
- has returned home to their family from 'looked after' care
- is newly adopted or being cared for permanently by a family member other than their biological parents
- has a parent/significant other going through the criminal court system/in custody/serving a custodial sentence in prison, or is affected by parental offending
- is showing early signs of being at risk from abuse, exploitation, and/or neglect (including group-based)
- has exhibited early signs of abusive, violent and/or harmful behaviours towards others
- is at risk from threats, sexual exploitation, criminal exploitation, radicalisation, with staff being aware that there may be an overlap that can occur between online harm and harm experienced in person
- is showing emerging signs of becoming gaming /addicted to gambling
- is in kinship care, including being a privately fostered child, with staff being aware that they may need to support both parents and kinship carers at the same time
- is LGBTQ+ (or is perceived to identify as LGBTQ+)
- is questioning their gender (or is perceived to be questioning their gender)

In addition, staff must be aware:

- of and able to identify where a pregnant person (parent) might need help or support to provide safe and suitable care for their unborn child well
- of new and emerging technologies (such as artificial intelligence) and the role that online platforms, including gaming and social media platforms, can play in grooming children and facilitating and/or causing harm
- that a pupil and their family may be experiencing multiple needs at the same time
- and recognise how trauma, racism, discrimination, and past experiences with services affect relationships and adapt practice, accordingly, respecting the importance of different cultural models of parenting and family life.

This is not an exhaustive list and there may be many other factors or situations that could mean that a pupil may require early help or intervention, or their family will benefit from support to prevent concerns escalating.

Many forms of early help to pupils and families can also be offered via signposting parents/carers of pupils to helpful local organisations prior to contacting the local authority Family Help team.

Early help interventions can also occur within school.

Escalation of need/risk of harm

All pupils and families at the Targeted Early Help and Family Help stage must be kept under constant review and consideration given to a referral to the local authority Children's Social Care for assessment for statutory services if the pupil's situation does not appear to be improving or is getting worse, and/or the parents/carers are not engaged with the support recommended to meet their child's unmet need (see below for information about interventions under section 17 or section 47 of the Children Act 1989).

Children who have a Social Worker

Children may need a Social Worker (local authority children's Social Care) due to safeguarding or welfare needs. Children may need this help due to abuse, neglect, and/or exploitation and/or complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and positive mental health.

Local authorities should share with schools the fact a child has a Social Worker and inform schools whether the child is subject to a Child in Need (s17) or Child Protection (s47) Plan. However, it is more than likely that the school will have been involved in any assessment leading to the child being made subject to a statutory 'plan' (see below for types of plan). The DSL or the DDSL in the DSL's absence, must attend all 'plan reviews'.

Where pupils have an allocated Social Worker, this should inform school decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services). Any new information

or safeguarding concern that the school has about any pupil on a statutory plan, must and will, be shared with the pupil's allocated Social Worker (or their Team Manager in their absence).

Children in Need*

A Child in Need is defined under the Children Act (1989) as a child who is;

- unlikely to achieve or maintain a reasonable level of health or development; or
- whose health and development is likely to be significantly or further impaired, without the provision of services; or
- a child who is disabled.

Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. A child who is deemed to be a Child in Need will have been assessed by Children's Social Care under section 17 of the Children Act (1989)*. The child will have a Child in Need Plan which should be shared by the allocated Social Worker with the school. The school will attend and participate in Child in Need Review meetings, as arranged by the local authority.

*Please note that some Child in Need plans will be managed at the Family Help stage, with a Lead Practitioner receiving oversight from a Social Worker.

Children suffering or likely to suffer significant harm

Local authorities, with the help of other organisations as appropriate, including the school, have a duty to make enquires, and take decisive action, under section 47 of the Children Act (1989) if they have reasonable cause to suspect that a child* is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse, neglect, domestic abuse (including controlling or coercive behaviour), teenage relationship abuse, trafficking, online abuse, female genital mutilation or other so-called honour-based abuse, and extra-familial threats like the influences of extremism which could lead to radicalisation, and sexual/criminal/financial exploitation.

*Section 47 applies to all children, whether they are living with their birth parents, in a kinship arrangement or under a special guardianship order, or in foster or residential care.

Actual or likely significant harm should be assessed through an anti-racist, anti-discriminatory and culturally aware framework, applying knowledge of faith, beliefs and family cultures that can positively and negatively impact on children, whilst maintaining a core focus on the safety and wellbeing of the child involved

Should an investigation occur, then the school's involvement and any action may be determined on the advice given by the investigating agency. Whatever the form of abuse, neglect and/or exploitation, those across agencies involved in the investigation, including schools, must adhere to the steps raised on page 250 of WTSC 2026.

In summary they must:

(*the word 'children' signifies all pupils)*

- put the needs of children first, understanding their experiences and responding to their needs when determining what action to take
- speak to and observe the child at the earliest opportunity to understand what is happening in their daily life, recognising that the child may express this non-verbally through their actions and behaviour. Ask questions sensitively, interpreting non-verbal cues and applying professional curiosity
- understand that children can experience more than one type of harm simultaneously
- be responsive to the needs of children who have harmed as well as been harmed, including referring to other agencies where there is a risk of continued harm to others
- work with the family to build trusting and co-operative relationships with parents and carers, in line with the principles for working with parents and carers (as set out above in Part 1)
- use their skills and experience to recognise circumstances where parents or carers are reluctant or unable to engage and seek to understand and address the factors that might underly this. These could include issues such as: language, technology or working patterns; parental special educational needs or disabilities; mental ill health and/or substance misuse; being a victim of domestic abuse (including emotional abuse and coercive or controlling behaviour); prior experience of services, including previous removals of children; or abuse arising from 'honour', faith- or belief-based abuse which limits the parent or carer's capacity to engage.
- speak to and gather detailed information about the child and, where appropriate, their siblings, through engaging with the family network and those who know the child well, such others working in the school
- in the case of children whose parents/carers are considering home education, speak to the local authority elective home education team/home education service
- consider a wide range of evidence from many sources, including other agencies working with the family (for Social Care/Police)
- recognise and respond to the specific needs and vulnerabilities of children with SEND and/or additional needs, including medical/health conditions
- understand the impact of poverty. Practitioners should be skilled at recognising the distinction between poverty and neglect and respond accordingly
- be inclusive, anti-discriminatory and responsive to the needs and experiences of children and families of different ethnic, cultural and religious backgrounds. Practitioners should remain alert to any bias in practice that may adversely impact particular groups or communities and consider children foremost in terms of their vulnerability to harm. For instance, care should be taken to ensure children of particular ethnic backgrounds are not treated as older than they are
- • recognise that 'looked after children', and previously looked after including Care Leavers, can experience actual or likely significant harm. Where a child is looked after, child protection activities should align with care planning processes and decision making, working with relevant carers and practitioners

Where the child is already known to services, assessments should build on existing information, activity, assessments and plans, including those completed in Family Help under section 17 of the Children Act 1989, at or at the levels of Targeted Early Help, and in Community-Based Early Help

Following the investigation under s47

If the pupil is made subject to a Child Protection plan, following the assessment under s47 and an Initial Child Protection Case Conference reaching conclusion that a child is at risk of significant harm, their Child Protection Plan will be shared by the allocated Social Worker with the school safeguarding team.

The DSL/DDSL will attend and participate in regular meetings (known as Core Groups), as arranged by the local authority.

Where the decision is taken not to proceed with a section 47 enquiry or child protection plan, or to discharge a child protection plan, the lead practitioner should consider the ongoing support that the child requires, which might include Family Help support including under section 17 of the Children Act 1989 or support from universal or early help services.

Where it is decided that no further action is necessary, the reasons for this should be recorded and shared with the child, family and practitioners involved with the family (including the school),

Looked After Child

Please see above in Part 2-section T- 8- B

If it is necessary to remove a child from their home, the local authority must, wherever possible and unless a child's safety is otherwise at immediate risk, apply to the courts for an Emergency Protection Order (EPO). Police powers to remove a child in an emergency should be used only in exceptional circumstances where there is insufficient time to seek an EPO or for reasons relating to the immediate safety of the child.

For further guidance on EPOs see Chapter 4 of the statutory guidance document for local authorities, Court orders and pre-proceedings (DfE, April 2014).

Practitioners working with looked after children should be aware of their increased vulnerability to certain forms of harm, including child sexual exploitation. Some children living in residential settings will have increased vulnerabilities, for example due to SEND, being placed out of area, a history of frequently going missing or because they have been deprived of their liberty.

See Working Together to Safeguarding Children (2026) for further information about local authority statutory Social Care processes in regard to looked after children.

V Contextual Safeguarding and Extra Familial Harm

All staff should be aware that pupils can be at risk of harm inside and outside of the school, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of pupils who may be in need of help or protection.

Contextual Safeguarding

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools, and online can feature violence and abuse, neglect and/or exploitation.

Parents/carers can often have (or feel that they have) little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent/carer-child relationships. Staff should consider the importance of understanding intra familial harms and any necessary support for siblings following incidents of child-on-child abuse, including PSB, HSB, Sexual Harassment and/or Sexual Violence (see above).

The contextual safeguarding approach says that local authority children's Social Care practitioners, child protection systems and wider safeguarding partnerships need to engage with individuals and sectors who do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices.

Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse *beyond their front doors*. This also includes the risk of abuse, neglect and/or exploitation occurring in or outside of school.

Additional information is available here: Contextual Safeguarding.

Extra-familial Harm

While there is no legal definition for the term extra-familial harm, it is widely used to describe different forms of harm that occur in contexts outside of their home. Children may be at risk of or experiencing physical, sexual, or emotional abuse and exploitation. Contexts can include peer groups, school, and community/public spaces, including known places in the community where there are concerns about risks to children (for example, parks, housing estates, shopping centres, takeaway restaurants, or transport hubs), as well as online, including social media or gaming platforms.

Children can be vulnerable to multiple forms of extra-familial harm from both adults and/or other children, and harm may be perpetrated or facilitated by individuals or groups.

Examples of extra-familial harm may include (but are not limited to):

- criminal exploitation (such as County Lines and financial exploitation)
- serious harassment and/or violence
- modern slavery* and human trafficking (see above and below)
- online harms

- sexual exploitation (including group-based child sexual exploitation)
- serious youth violence, including the use/threat of weapons
- child-on-child abuse (non-familial)
- sexual abuse, (including harassment and exploitation) and other forms of harmful sexual behaviour displayed by children towards their peers,
- domestic abuse, controlling coercive control, including stalking
- abuse in their own intimate relationships (sometimes called teenage relationship abuse) – including physical sexual, emotional abuse, and stalking
- the influences of extremism which could lead to radicalisation.

*Modern Slavery

Modern slavery is a complex crime and may involve multiple forms of exploitation. It encompasses:

- human trafficking
- slavery, servitude, and forced or compulsory labour

An individual could have been a victim of human trafficking and/or slavery, servitude and forced or compulsory labour. Victims may not be aware that they are being trafficked or exploited, and may have consented, without having informed consent, to elements of their exploitation, or accepted their situation.

The National Referral Mechanism (NRM) is the UK's system for identifying victims of modern slavery and human trafficking. If a staff member has concerns that a pupil may be a potential victim of modern slavery or human trafficking (including through Child Criminal Exploitation such as County Lines and/or Child Sexual Exploitation) then they must use the school procedure in the first instance, ensuring that the pupil's medical and emotional needs are addressed as the priority.

A referral must be made by the Safeguarding team to the Police. Under their responsibilities as designated First Responders, they will make a referral to the NRM and to the local authority children's Social Care (schools should check with Social Care that they have received this referral; there must be no delay). A pupil's consent is not needed for a referral to the NRM to be made by the Police.

Resources

Child exploitation disruption toolkit – Home Office (UK) statutory guidance

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

See Working Together to Safeguard Children for further information about extra-familial harms and environments outside the family home.

W Signposting to further information

Annex A of KCSIE contains further guidance, and resources, including useful contacts for organisations, on a range of specific safeguarding issues, some of which are detailed above.

This section must be read by all staff that work directly with pupils and those with governance oversight for the school. Annex A contains:

- Child abduction and community safety incidents
- Children and the court system
- Children who are absent from education and/Missing Education
- Children with family members in prison
- Child Criminal Exploitation (CCE)
- Child Sexual Exploitation (CSE)
- County Lines
- Modern Slavery and the National Referral Mechanism
- Cybercrime
- Domestic abuse, including Operation Encompass
- Homelessness
- Honour-based abuse
- FGM, including mandatory reporting duty for teachers
- Forced Marriage
- Preventing radicalisation
- The Prevent duty
- Channel
- Child-on-child abuse
- Sexual Violence

Part 3: Process

Contents

A. Reporting and recording in relation to pupils
B. Reporting and recording in relation to staff (not parents/carers) including:

1. Expectations of staff conduct
2. Low-Level concerns
3. Self-Reports
4. Allegations

C. Whistleblowing
D. Managing situations involving child on child abuse
E. Managing situations involving self-generated intimate imagery/videos, (nudes and semi nudes) including those that are AI generated
F. Managing situations involving PSB, HSB, Sexual Harassment and Sexual Violence
G. Managing situations involving mental health
H. Visiting Speakers
I. Lettings for individuals and organisations

A Reporting and recording in relation to pupils

Contents

1. What to do if you have a concern about a pupil
2. What to do if a pupil makes a disclosure
3. Actions following a concern/disclosure
4. Making referrals
5. Multi-agency working arrangements
6. Confidentiality
7. Photos
8. Record-keeping
9. Passing on records

1 What to do if you have concerns about a pupil

Staff

All staff should know what to do if they have concerns about a pupil's welfare or when pupils or staff raise concerns about a pupil to them.

Staff should understand the difficulties pupils may have in approaching them and the need to build trusted relationships.

All staff should be aware that pupils may not feel ready or know how to tell someone that they are being abuse, neglected and/or exploited, and/or they may not be able to recognise their experiences as harmful.

Staff should be aware that the first approach/disclosure from a pupil may not be the only incident that has happened. It is appropriate therefore, to ask the pupil whether something like this has ever happened to them before.

If staff have a concern about a pupil but are not sure if this amounts to a safeguarding concern, they must notify and speak to the DSL/DDSL on the same day. There must be no delay.

Where staff have a concern which they are confident amounts to a safeguarding concern, they will be able to upload their concern directly onto the ECMS used in the school. The DSL/DDSL will discuss the concern with the staff member who has raised it and then make the necessary decisions that are required.

In more serious situations, where a pupil has made a disclosure that suggests they have been harmed (by themselves, another pupil/child, or by an adult (including staff)) or are likely to be harmed, staff must report this verbally and immediately to the DSL (or in their absence the DDSL). Please see below for further information around disclosures.

There must be no delay in the absence/unavailability of the DSL/DDSL; schools should contact the RSL as needed, and/or the local authority children's Social Care.

Informing Parents/Carers of concerns

Parents/carers must always be informed of all concerns raised about their child on the same day, unless to do so in disclosure situations where the child may be at increased risk. In the latter situations, at a suitable point, once risk has been assessed, the parents/career *will* be informed, after advice and direction has been received from the authorities e.g. Social Care/Police.

Where parents/carers are no longer together i.e. separated or divorced, information about the concern must be shared with both parents so that the school remain impartial (unless to do so may raise the risk for the pupil and/ or one of the parents e.g. in a case where there is serious acrimony or domestic abuse).

2 What to do if a pupil makes a disclosure

Staff must know how to respond should a pupil make a safeguarding disclosure to them.

The points below support all staff in a situation where a pupil tells them that they know about or have been a victim of abuse, neglect, and/or exploitation. They also apply when a pupil discloses that they have self-harmed / have suicidal ideation / have made a suicide attempt (whether in school/outside of school).

- Listen carefully and allow the pupil to speak freely and remain calm.
- Try not to interrupt the pupil or be afraid of silences.
- Recognise that there are many barriers to a pupil making a disclosure.
- Provide reassuring nods and words such as, "I am so sorry this has happened", "You are doing the right thing in talking to me".
- Avoid saying things like, "I wish you had told me about this earlier" or "I cannot believe what I am hearing".
- Do not question the pupil about what they are saying extensively, as partner agencies e.g. Social Care/Police will lead any investigation.
- Seek a context around what the pupil has said.
- Limit questioning to the minimum necessary for clarification using What, When, How and Where. Avoid leading questions such as, "Has this happened to your siblings?"
- Do not use questions beginning with Why as this can apportion feelings of guilt within a pupil.
- If the pupil discloses abuse, neglect, and/or exploitation, it is appropriate to ask whether any other adults/children were present and observed/involved in what happened, and whether anything like this has happened before
- Staff should summarise for the pupil what they have said as the conversation continues when there are natural breaks, or at the end, to ensure that they have heard and understood the information accurately, mirroring back to the pupil their own words and descriptions, occasionally stopping to check.
- At an appropriate time in the conversation, the staff member should tell the pupil that the matter will be passed onto to those that need to keep them safe in confidence, always using language that is appropriate to the age and stage of development of the pupil, allowing for their individual need.
- Take the pupil directly to the DSL/DDSL, or if not immediately available, ensure that the pupil is supervised until emotionally stable.
- If the pupil has disclosed abuse and also spoken about physical pain and/ or physical discomfort, medical intervention must happen immediately whilst the DSL/DDSL makes a referral to the local authority children's Social Care/Police. No photos must ever be taken of injuries (see below) and staff must be mindful of removing any forensic evidence if managing injuries (seek advice).
- tell the pupil that the school needs to keep them safe and what will happen next i.e. they will go with you to see the DSL/DDSL in their absence. The DSL/DDSL must make themselves available immediately should a disclosure of abuse, harm etc be made by a pupil. If this is not possible, a staff member should contact the RSL.

3 Actions following a concern/disclosure

Following notification of a concern/disclosure, the DSL and the safeguarding team will consider the necessary course of action to support the pupil.

The case management process includes, but is not limited to:

- Information gathering
- Information sharing (within the Safeguarding team)
- Identifying and assessing the level of need and support to address the concern
- Identifying who in the school has the responsibility to take decisions on need and support
- Recording the rationale for all decisions taken
- Identifying who will inform the parents/carers of the concern, after risk assessing
- Identifying who will deliver the support to the pupil
- Recording, monitoring, and evaluating interventions for the pupil
- Creating Safeguarding Risk Assessments where needed
- Undertaking Case Reviews every 6 weeks
- Liaising with other agencies as required

4 Making referrals

If a pupil is thought to be at risk of harm

If a pupil is at risk of harm, a referral should be made to their local authority children's Social Care immediately.

If it is assessed that a criminal offence has occurred, or they/a parent/carer may be imminent danger the school should first contact the Police, followed by Social Care. Whilst any member of staff can and should know how to make a referral to the authorities, our policy is that any referral will be done by the DSL or DDSL. However, there must be no delay.

Depending on who obtained the initial disclosure i.e. if a member of teaching staff first receives a disclosure or has a concern, the DSL/DDSL may also need to speak to the pupil, either to corroborate the pupil's account or to gain further context, prior to making any referral, to aid the authorities in their decision making.

The school does not require parental consent for referrals to be made to statutory agencies. Consent to do this must not be obtained from the parents if to gain consent would put the pupil's safety at risk (for example in situations where physical/sexual abuse by a parent/family member has been clearly disclosed by a pupil) or to do so could jeopardise any investigation by partner agencies (WTSC 2026)

The school should ask the leading authority whether and when the referral (and concerns) can be shared with the pupil's parents/carers when making the referral where seeking consent is a safeguarding element of the situation**.**

The DSL/DDSL must inform their Headteacher/Principal/Head of School **and the Regional Safeguarding Lead (RSL)** of all referrals to authorities.

Response from Social Care

Within one working day of a referral being made by the school, a local authority Social Worker should acknowledge its receipt to the school and make a decision about the next steps and the type of response that is required (WTSC). This will include determining whether:

- the pupil (s) requires immediate protection and urgent action is required
- any services are required by the pupil and family and what type of services
- the pupil is in need and should be assessed under section 17 of the Children Act 1989.
- there is reasonable cause to suspect the pupil is suffering or likely to suffer significant harm, and whether enquiries must be made, and the pupil assessed under section 47 of the Children Act 1989
- further specialist assessments are required to help the local authority to decide what further action to take.

The school should follow up if this information within 24 hours of making their referral, if the above information is not forthcoming. In cases of disclosure, the DSL/DDSL must have more urgent and ongoing conversations with Social Care to ensure that the pupil is protected.

If a disclosure of abuse has been made against the parent/carers, or if there is any other known risk associated with informing them of the disclosure (see above) no pupil must be allowed to leave the school site with their parents/carers until Social Care/Police have agreed they can, following the school referral.

If it is nearing the end of the school day, and the latter agencies have still not made contact with the school, the DSL/DDSL must escalate their referral and seek advice about whether the parent/carer can collect the pupil. If this conversation has not been able to take place, the school has a justification for delaying the pupil in school whilst decisions are made by the above agencies. The pupil's parents/carers must be kept separately to the pupil.

If Social Workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment (supported by the DSL/DDSL as required, who will usually take the lead).

If, after a referral, the pupil's situation does not appear to be improving, the DSL/DDSL should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the pupil's situation improves.

Mental Health

If the pupil has expressed any suicidal ideation when they disclosed their abuse, they must be 100% supervised by appropriate staff until support can be put in place, and referrals made. If to follow normal processes i.e. informing the pupil's parents/carers of their ideation and asking them

to collect their child would heighten risk to the pupil/other, then the pupil must be supervised until such time that statutory agencies e.g. Social Care/Police have made their initial decisions.

If a pupil is not at risk of harm but has unmet needs

In these situations, the school must consider the local authority Universal, Community-Based, Targeted Early Help and Family Help route to provision of support (see above). Please refer to the pupil's local authority Threshold document and levels of service (see above). When a pupil is not considered at risk of harm but still has unmet needs that is impacting or likely to impact on their health and development i.e. at Child in Need level (s17 Children Act 1989), a referral should still be made to Children's Social Care (unless in their local authority these referrals now go to Family Help directly- see above).

The school does not require parental consent for referrals to be made to statutory agencies; however, it is best practice in these situations where risk is not present for any referral to be made transparently with the parent's/carer's knowledge. Note, some local authorities do not accept referrals at this level without parental consent.

5. Multi-agency working arrangements

For more information about multi-agency working arrangements, please see above: Part 1-S,

The DSL and Deputy DSLs liaise and work in partnership with all agencies in the best interests of pupils in the school.

Safeguarding Partners and Child Death Review partner arrangements (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for an area (any part of which falls) within the local authority area) publish a local 'threshold' document (see above). The DSL and any deputies should liaise with the three Safeguarding Partners and work with other agencies in line with Working Together to Safeguard Children (2026).

'NPCC - When to call the police' should help DSLs understand when they should consider calling the Police and what to expect when they do. Under the Police and Criminal Evidence Act (PACE) (1984) – Code C, the DSL is aware of the requirement for pupils to have an 'Appropriate Adult' when in contact with Police officers who suspect them of an offence (see below). PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for the purposes of this Code and any other Code.

Appropriate adult

PACE also states that if at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an 'Appropriate Adult' at any point. The DSL will communicate any vulnerabilities known by the school to any Police Officer who wishes to speak to a pupil about an offence they may suspect. This communication must be recorded using the school's recording systems. If, having been informed of the vulnerabilities, the DSL does not feel that the officer is acting in accordance with PACE, they should intervene in any interview, ask to speak with the officer's supervisor or contact 101 to escalate their concerns.

A person whom there are grounds to suspect of an offence must be cautioned before questioned about an offence or asked further questions if the answers they provide the grounds for suspicion, or when put to them the suspect's answers or silence, (i.e. failure or refusal to answer or answer satisfactorily) may be given in evidence to a court in a prosecution.

A Police Officer must not caution a juvenile or a vulnerable person unless the appropriate adult is present. If a child or a vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.

The 'Appropriate Adult', in the case of a child must be:

the parent, guardian or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation, a Social Worker of a local authority failing these, some other responsible adult aged 18 or over who is not:

- a Police Officer
- employed by the Police
- under the direction or control of the chief officer of a Police force; or
- a person who provides services under contractual arrangements (but without being employed by the chief officer of a Police force), to assist that force in relation to the discharge of its chief officer's functions.

Further information can be found in the Statutory guidance - PACE Code C 2019.

https://www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible

6 Confidentiality

Whilst is always important to take into consideration pupil's wishes and feelings, staff must never guarantee confidentiality to them as this may not be in their best interests. They should let the pupil know that they will pass on information in confidence only to the people who must be told to ensure their safety (Safeguarding Team members e.g. the DSL and DDSLs).

7 Photos of abuse/injury

If a pupil discloses physical abuse, self-harms, and/ or attempts to take their life, staff must never take photos of their injuries. On exceedingly rare occasions, a member of the safeguarding team may be directed by the authorities (Police/Social Care only) to take a photo of a pupil's abuse injury and send it to them for their assessment of risk.

The staff member must use a school device (only) to take photos, and they must have a witness present when doing so.

They must never take intimate photos of any genital or chest area.

Images must be sent securely, and then deleted from school device as soon as the authorities confirm receipt of the images. A record must be made as soon as possible who has asked this task to be done noting their role and contact details.

8 Record-Keeping

Why is recording important?

Research and local child safeguarding practice 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
- failing to re-assess concerns when situations do not improve
- not sharing information with the right people within and between agencies
- sharing information too slowly, and
- a lack of challenge to those who appear not to be taking action.

Having clear safeguarding records also help if/when responding to any parental complaints about the way a case has been handled by the school.

Managing safeguarding records in our school

All safeguarding-related records are be kept in a secure location with restricted access/permissions. These are on the schools' Electronic Case Management System (ECMS).

All concerns, discussions and decisions made, and the reasons for those decisions, must be recorded on the ECMS. These must be for each pupil involved in any situation.

In principle, records must include, but not be limited to:

- a clear and comprehensive summary of the concern and/or disclosure including context
- details of how the concern/disclosure was initially followed up by the safeguarding team and resolved i.e. note of the immediate action (s) taken, decisions reached (see above), and school interventions (including referrals to agencies). Outcomes must always be recorded.
- confirmation that all those with parental responsibility for the pupil have directly been informed of the concern/disclosure (unless to do so would heighten risk at that time to the pupil/others).
- the eventual outcome in terms of whether the unmet need was met/harm addressed and /or reduced (this will usually occur later).

In cases where a pupil has disclosed harm or likelihood of harm, staff must:

- as stated above, prior to writing up their record, immediately discuss the concerns verbally with the DSL, so that immediate action can be taken. If the DSL is not available then this should not delay appropriate action being taken and staff should speak to the DDSL, Headteacher/Principal or failing that the RSL (or Social Care)
- make a written record of any conversation with the pupil as soon as possible, using school systems
- use the specific words that the pupil used when they disclosed (e.g. if referring to parts of their body), indicating these words by using “speech marks/inverted commas”.

The Safeguarding team are responsible for making decisions on next steps and actions following any disclosure or reported concern. All discussions and decisions made, and the reasons/rationale for those decisions being made (AND for others **not** being made), must be recorded in writing by the DSL/DDSL throughout the pupil’s safeguarding record.

Further actions, meetings, and decisions may be required after the initial concern has been raised.

For all disclosures, it is likely that there will more recording required, and a lengthy period of intervention.

9 Passing on safeguarding records when a pupil leaves the school

Information sharing is vital in identifying and tackling all forms of abuse, neglect, and/or exploitation. KSCIE emphasises the need for pastoral information to be passed on about pupils for whom there has a been a safeguarding concern, as a lack of information about their circumstances can impact on the pupil’s safety, welfare, and educational outcomes.

Whilst data protection legislation (see above) places duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure, this is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

When a pupil leaves the school, it is the responsibility of the DSL to ensure that a copy of their safeguarding records is transferred securely and confidentially to the new school. Records must be transferred within 5 days for an in-year transfer or within the first 5 days of the start of a new term (KCSIE).

Before transferring data, the DSL will arrange a telephone call with the DSL or Headteacher/Principal in the receiving school to ensure that the former pupil has started their school as planned/informed. Following their conversation, the DSL will arrange for the secure transfer of documentation.

No sensitive data /information must be passed onto the pupil’s pending new school, including verbally, until they are formally on roll and in their new school. Confirmation of the receipt of the documentation must be retained with safeguarding records. A safeguarding record must be

transferred separately from the main pupil file (see *internal document* Safeguarding Toolkit for further detail).

In some situations, the DSL should consider if it would be appropriate to share any information with the new school in advance of a pupil leaving, for example, information that would allow the new school to continue supporting victims of abuse, neglect and/or exploitation and have time to arrange for appropriate support in place for when the child arrives. This should be done with parent/carer's knowledge, unless to do so would heighten any risk to the child or younger person (if this is the case, then Social Care are likely to already be involved, and the school must seek (and record) their advice about what information should be shared).

B Reporting and recording concerns about an adult (not parents)

Contents

1. Expectations of staff conduct
2. Low-Level concerns
3. Self-Reports
4. Allegations

1 Expectations of adults

All references in this section to "adults" should be interpreted as meaning any adult, staff members, trainee teachers, agency/supply staff, self-employed, contractors, volunteers and visitors, unless otherwise stated.

The safety and wellbeing of pupils in our school is dependent on the vigilance of all our staff. Their prompt communication to the DSL, DDSL or Head of School of any concerns, no matter how small, regarding the conduct by an adult in the school which causes them to doubt that adult's suitability to work with or have access to children is paramount.

As a result of their knowledge, position and/or the authority invested in their role, all adults working with pupils are in positions of trust in relation to the pupils in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable pupils. All members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. A position of trust could arise even if the member of staff does not teach the child . Staff should note that it is an offence for a person aged 18 or over and in a position of trust to touch any child in a sexual way or have a sexual relationship with any child.

The notification and prompt handling of all concerns about adults, including those raised by individuals about themselves (see below for Self-Reports), is fundamental to safeguarding children.

All adults must behave responsibly and professionally in all dealings with pupils and must always follow the procedures set out in our 'Staff Code of Conduct.' Adults must be clear about what appropriate behaviour is, and be confident in distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour, in themselves and/or others. Adults should always avoid behaviour which might be misinterpreted by others.

Those raising concerns or reporting allegations in good faith will always be supported. Adults in respect of whom concerns or allegations have been raised will not suffer any detriment unless the concern or allegation is found to be substantiated.

It is essential that all adults know the differences between Self Reporting, Low-Level Concerns, Allegations, and Whistleblowing, and know how to report any concerns. They should also be familiar with the Complaints Policy so that they can direct parents/carers to the Headteacher/Principal as required.

2. Low-Level Concerns

What is a Low-Level Concern?

The term 'Low-Level Concern' does not mean that it is insignificant. A Low-Level Concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that **another adult** working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff Code of Conduct/other Cognita policy (including inappropriate conduct outside of work), and
- does not meet the threshold to be an Allegation (see below) and/or
- is otherwise not considered serious enough to consider a referral to the LADO

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

- being over friendly with pupils or having favourites
- engaging with a pupil on a one-to-one basis in a secluded area or behind a closed door (whether on /off site)
- using inappropriate, humiliating, belittling, critical, offensive, sexualised, or intimidating behaviour / language (including shouting, being verbally aggressive, and/or saying words that could impact on their wellbeing)

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 intended to enable abuse.

Why do we have a Low-Level Concern policy?

The overarching aim of the school's Low Level Concern Policy is to facilitate a culture in which the clear values and expected behaviours which are set out in our Code of Conduct are lived, constantly monitored and reinforced by all staff. Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately is critical. If implemented this should :

- identify any weaknesses in the school safeguarding systems
- identify, prevent, and minimise the risk of abuse occurring
- protect adults against misunderstandings or misinterpretations
- encourage openness, trust, and transparency
- enable the school to identify inappropriate, problematic, or concerning behaviour early
- ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the school

In particular, the intention of this policy is to:

- maintain a culture of openness, trust and transparency in which adults are confident and clear about expected behaviours of themselves and their colleagues, the delineation of boundaries and reporting lines
- ensure that adults feel empowered to raise any Low-Level Concern about a colleague's behaviour, where that behaviour might be construed as falling short of the standards set out in our Code of Conduct or other Cognita policy; and
- provide for responsive, sensitive and proportionate handling of such concerns when they are raised – maintaining on the one hand confidence that concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting adults from false allegations or misunderstandings.

What do you have to do if you have a Low-Level Concern?

Low-Level Concerns may arise in several ways and from a number of sources. For example, suspicion, complaint or disclosure from a pupil, parent, or other adult within or outside of the school, or as a result of vetting checks undertaken.

Where a Low-Level Concern (including Self-Reports- see below) exists, it must be recorded in writing **using the relevant form** and given/sent to the DSL or to the Headteacher/Principal/Principal **only** as soon as reasonably possible, on the same day as the incident (where the concern relates to a particular incident). This record includes the details of the concern, the context in which the concern arose, and once received, the action taken by the Headteacher/Principal/DSL.

How is the Low-Level Concern is dealt with?

When the DSL/Headteacher/Principal/Principal receives the report, they must inform the other in a timely fashion (within the day). If the DSL and Headteacher/Principal/Principal are unavailable, the adult with the concern should contact their RSL. There must be no delay.

Where a Low-Level Concern relates to a person employed by a supply agency or a contractor to work in the school, that concern should also be shared with the DSL and/or Headteacher/Principal/Principal. Their employer will be notified about the concern by the DSL/Headteacher/Principal/Principal, so that any potential patterns of inappropriate behaviour can be identified.

a) the threshold is met for an allegation (see below);

b) there is a pattern of Low-Level Concerns which collectively amount to an allegation; or

c) there is other information which, when taken into account, leads to an allegation.

The Headteacher/Principal/Principal is the ultimate decision maker in respect of all Low-Level Concerns; however, it is safe and best practice that they consult with the DSL and take a more collaborative decision-making approach.

The DSL and Headteacher/Principal/Principal will discuss all Low-Level Concerns they receive on the same day as the concern was raised. The Headteacher/Principal/Principal, in collaboration with the DSL, will, in the first instance, satisfy themselves that it is a Low-Level Concern and should not be reclassified as an **Allegation** and dealt with under the appropriate 'allegations' procedure (outlined later in this document).

The circumstances in which a Low-Level Concern might be reclassified as an allegation are where:

a) the threshold is met for an allegation

b) there is a pattern of Low-Level concerns which *collectively* amount to an allegation or

c) there is other information which, when considered, leads to an allegation.

If there is any doubt about the Allegations threshold, the DSL/Headteacher/Principal/Principal will seek advice from the RSL immediately, or the ERM in the latter's absence. There must be no delay.

The Headteacher/Principal/Principal can also seek advice from the LADO should the above Cognita colleagues be unavailable.

Next steps

Having established that the concern **is** Low Level, the DSL or Headteacher/Principal/Principal, as appropriate, will first discuss it with the individual who has raised it to gather context and any further information. The person who has raised the Low-Level Concern about the adult will remain anonymous to the subject of the Low-Level Concern.

The adult to which the Low-Level Concern relates **must** be informed of any concern raised about them once all risk has been identified and assessed.

Staff witnesses may be interviewed as relevant, as will pupils with their parental consent. The DSL/Headteacher/Principal/Principal must seek the advice of the RSL/ERM Manager in the case of speaking to pupils as needed.

Most Low-Level Concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training, etc.

The DSL/Headteacher/Principal/Principal will seek advice from the RSL/ERM as needed around recommendations or actions for the adult.

Record keeping of Low-Level Concerns

Where a Low-Level Concern has been communicated, it, plus all associated documentation will be kept in a school central file which logs all Low-Level concerns A-Z according to staff member/adult surname; this file must only be accessible by the DSL and the Headteacher/Principal/Principal. Any rationale for any decisions made and actions taken, must be recorded on the Low-Level Concern form by the Headteacher/Principal/Principal/DSL. Minutes of all meetings with relevant adults/pupils must also be recorded and retained.

Records should be reviewed by the Headteacher/Principal/Principal so that potential patterns of inappropriate, problematic or concerning behaviour related to the adult can be identified. Where such a pattern is identified, the Headteacher/Principal/Principal will decide on a course of action for the individual.

Consideration will also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur, and where appropriate procedures will be revised, or extra training provided to staff to minimise the risk of such behaviour happening again.

Retention

When staff leave the school, any record of Low-Level Concerns which are stored about them will be kept for a period of ten years and, following this, reviewed as to whether or not that information needs to be kept.

Consideration will be given to:

(a) whether some or all the information contained within any record may have any likely value in terms of any potential historic employment or abuse claim so as to justify keeping it, in line with normal safeguarding records and practice; or

(b) if, on balance, any record is not considered to have any value, still less actionable concern, and ought to be deleted accordingly.

Retention is necessary to see whether any patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the local authority Designated Officer (LADO).

No record will be made of the concern on the individual's personnel file unless either:

a) the concern (or group of concerns) has been reclassified as an allegation; or

b) the concern (or group of concerns) is sufficiently serious to result in formal action under the school's grievance, capability or disciplinary procedure

c) the concern is determined to meet the threshold of an allegation when considered with any other low-level concerns that have previously been raised about the same individual.

Specifically, if a referral is made to the LADO/other external agencies where the behaviour in question:

(i) had not originally been considered serious enough to consider a referral to the LADO but merited consulting with and seeking advice from them

(ii) is determined to meet the threshold of an allegation when considered with any other Low-Level Concerns that have previously been raised about the same individual

Records relating to the behaviour will be placed and retained on the staff member's personnel file, whilst **also** being retained in the school central Low-Level Concerns file.

References

Low-Level Concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a Low-Level Concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a Low-Level Concern (or group of concerns) has met the allegations threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

Summary:

Low- Level Concerns about an adult

From time to time, an individual may notice behaviour, statements, or actions in others which leave them concerned.

These are behaviours or actions which fall short of a formal **allegation** of abuse.

These tend to be behaviours which indicate that our Code of Conduct may not have been met.

Any such concerns can be dealt with as a Low-Level Concern.

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

- being over friendly with pupils and/or having favourites
- engaging with a pupil on a one-to-one basis in a secluded area or behind a closed door (on/off site)
- using inappropriate, offensive, belittling, humiliating, critical, sexualised, or intimidating behaviour / language (including shouting, being verbally aggressive, and/or saying words that could impact on their wellbeing)

What to do if you have a Low-Level Concern?

Where a Low-Level Concern exists, it must be reported to the DSL or Headteacher/Principal/Principal (only) as soon as reasonably possible on the same day.

They will confer on whether the LLC meets allegation threshold or not and take appropriate actions.

They must reach out to the RSL/ERM as required.

3. Self - Reports

What is a Self-Report ?

A Self-Report also falls under our Low-Level Concerns Policy. From time to time, an adult may find **themselves** in a situation which might appear compromising others, or which could be misconstrued.

Equally, they may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the Code of Conduct/other Cognita policy, falls below the expected professional standards, or breaches this policy.

Self-Reporting by adults in these circumstances is encouraged. This demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived.

As such, the school sees Self-Reporting as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

What do you have to do if you have a Self-Report?

A Self-Report must be reported in writing **using the relevant form** to the DSL or to the Headteacher/Principal/Principal (only) as soon as reasonably possible, on the same day as the incident (where the concern relates to a particular incident).

How is the Self-Report dealt with?

When the DSL/Headteacher/Principal/Principal receives the report, they must inform the other in a timely fashion (within the day). If the DSL and Headteacher/Principal/Principal are unavailable, the adult raising the Self-Report should contact their RSL/ERM. There must be no delay.

Record keeping

Where a Self-Report has been raised by an individual about themselves, a confidential record will be kept in a school central file which logs all Self-Reports A-Z according to staff member surname; this file must only be accessible by the DSL and the Headteacher/Principal/Principal.

Review

Records should be reviewed by the Headteacher/Principal/Principal so that potential patterns of inappropriate, problematic or concerning behaviour related to the adult can be identified. Where such a pattern is identified, the Headteacher/Principal/Principal will decide on a course of action for the individual.

Consideration will also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur, and where appropriate procedures will be revised, or extra training provided to staff to minimise the risk of such behaviour happening again.

4 Allegations

The purpose of this section of the policy is to outline how allegations against adults will be handled. Allegations will always be dealt with in accordance with statutory guidance provided in KCSIE.

What is an allegation?

Allegations represent situations that might indicate an adult may/would pose a risk of harm to children if they continue to work in regular or close contact with children in their present position or in any capacity.

This policy applies to all adults in the school- regardless of whether the school is where the alleged incident or pattern of behaviour took place- if it is alleged that they have have met one of the following four statements, often referred to as '**harm tests'**:

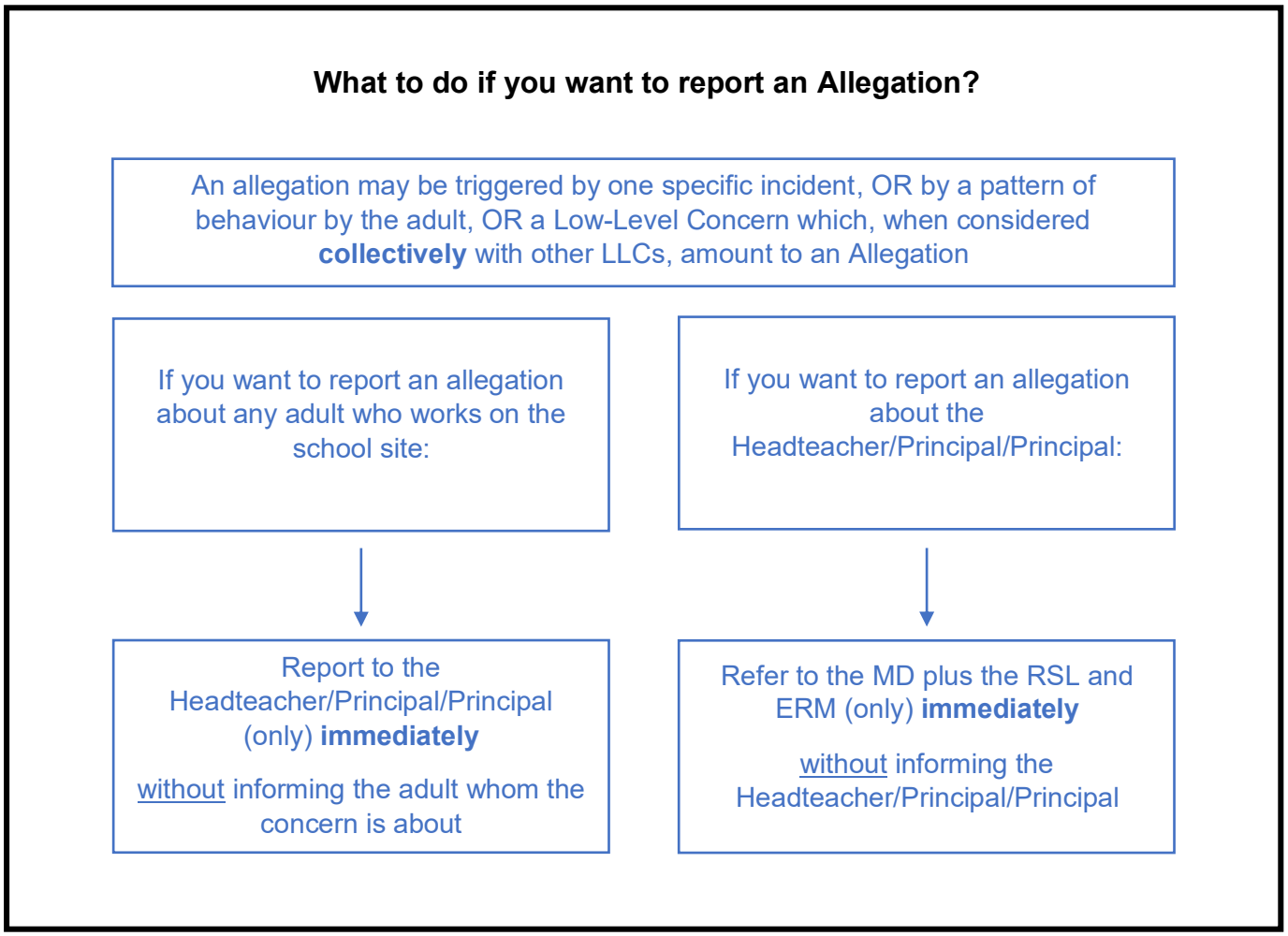
- behaved in a way that has harmed a child or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (this 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 and an assessment of this risk will be undertaken, seeking advice from the LADO where needed).

An allegation may be triggered by:

1. **one** specific incident
2. a pattern of behaviours and Low-Level Concerns which, **when considered collectively**, amount to an allegation (see above)

Allegations against a teacher who is no longer teaching must be referred to the relevant Police authorities.

Non-recent (i.e. historical) allegations of abuse must also be referred to the same.



Who does this policy apply to?

This policy applies to members of staff, trainees teachers, contractors, visitors, and volunteers who are currently working in any school, regardless of whether the school is where the alleged abuse took place.

Supply/Agency Staff/Hirers of school premises

This policy also refers to agency staff/supply staff/hirers of school premises (KCSIE) (see below). In some circumstances, schools will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers/other contracted staff provided by an employment agency or business, and some trainee teachers*. Whilst schools are not the employer of the above, they should ensure allegations are dealt with properly. Where this applies, schools share safeguarding responsibilities with the employment agency or business. Schools remain responsible for gathering the facts and managing

the safeguarding process, while working closely with the employment agency or business, which will usually lead on any disciplinary action. In no circumstances should a school decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority LADO to determine a suitable outcome.

Decisions will need to be made in discussion with the employment agency or business whether it is appropriate to suspend the individual, or redeploy them to another part of the school, whilst they carry out their investigation. Agencies and businesses should be fully involved and co-operate in any enquiries from the LADO, Police and/or local authority children's Social Care. The school will usually take the lead because agencies/businesses do not have direct access to pupils or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process.

The above group of individuals, whilst not employed by the school, are under the supervision, direction and control of the school when working in the school. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the school during the investigation. When using an agency/business, schools should inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

*Where concerns or allegations relate to a trainee teacher placed within the school, the expectations of schools set out above also apply. In addition, teacher training providers are expected to follow the same procedures as set out for supply agencies.

Non-recent allegations

Where an *adult* makes a non-recent allegation via the school that they were abused as a child by a current member of staff, the individual should be advised to report the allegation to the Police. The Headteacher/Principal/Principal must contact the RSL, ERM and the MD as a priority.

Where an *adult* makes a non-recent allegation via the school that they were abused as a child by a former member of staff, the individual should similarly be advised to report the allegation to the Police. The Headteacher/Principal/Principal must contact the RSL, ERM and the MD as a priority.

Non-recent allegations against current /former staff made by a current *pupil* must be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The school will follow the below processes.

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

Dealing with an allegation

Introduction

The procedures for dealing with allegations need to be applied with common sense and judgement, and be dealt with quickly, fairly and consistently.

Many cases may well either not meet the criteria set out above or may do so without warranting consideration of either a Police investigation or enquiries by local authority Children's Social Care services.However, some allegations will be so serious they require immediate contact and intervention by Children's Social Care services and/or the Police. These are situations where a pupil has been harmed, that there may be an immediate risk of harm to a child, or if the situation is an emergency.

There must be no delay.

There are two aspects to consider when an allegation is made:

Looking after the welfare of the pupil

Investigating and supporting the adult subject to the allegation

Initial Enquiries

Headteacher/Principals/Principal, **after first** liaising with the RSL, ERM, and MD (known as 'the group'), *may* need to gather some initial information to help them determine whether there is any foundation to the allegation **before** considering whether an onward referral to the LADO is required.

For example, whether:

- the individual and/or pupil was in the school at the time of the allegation
- the individual did, or could have come into contact with the pupil
- there were any witnesses
- there is any relevant CCTV footage

Schools should ensure they understand the local authority's arrangements for managing allegations, including the contact details and what information the LADO will require when an allegation is made. This information can be found in local policy and procedural guidance provided by the LADO service.

Before contacting the LADO, and *after liaising with the group*, schools should conduct these basic enquiries to establish the facts, being careful not to jeopardise any future Police investigation.

When to inform the individual of the allegation should be considered carefully on a case-by-case basis, with guidance as required from the 'group', the LADO, and if appropriate local authority children's Social Care and the Police. Unless agreed, the person to which the allegation has been made must not be informed or interviewed at this stage, so as not to jeopardise potential evidence gathering by external agencies.

Outcomes after initial enquiries

If, after the initial gathering of information it is decided by the Headteacher/Principal/Principal, alongside the above group of colleagues, that the concerns **do not** meet threshold for an allegation (and therefore no contact with the LADO is required), but they are a concern around **conduct**, the Headteacher/Principal/Principal will be supported by the ERM in the steps thereafter, with the RSL supporting as needed.

If, after the initial information gathering stage, it is decided that the concerns **do** amount to a Safeguarding allegation that **does** meet threshold for contacting the LADO (at least for advice about whether a referral is needed), the Headteacher/Principal/Principal will do so within one working day (or the DSL in their absence or delegation), and will be supported by the RSL, and HR colleagues in steps thereafter.

A Case Manager will be appointed in the school; this is likely to be the Headteacher/Principal/Principal or the DSL, or in some cases the Head of School/DDSL. In very serious and complex cases, or where there is a conflict of interests, the RSL will be the Case Manager.

Informing Parents/Carers

Parents/carers of the pupil (s) involved will be told about the allegation by the Case Manager as soon as possible if they do not already know of it. The Case Manager will seek advice from the 'group' about when and how this communication will happen.

However, where a 'Strategy Discussion' is required (in accordance with WTSC 2026, see below), or the Police or the local authority children's Social Care need to be involved, the Case Manager will not inform the parents/carers of the allegation until those agencies have been consulted and have agreed what information can be disclosed to the parents/carers.

Parents/carers will also be kept informed of the progress of the case, only in relation to their own child- no information can be shared regarding the staff member due to data protection legislation.

Parents/carers will also be made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers whilst investigations are ongoing, as set out in section 141F of the Education Act (2002). If parents/carers wish to apply to the court to have reporting restrictions removed, they will be told to seek legal advice.

In cases where a pupil may have suffered significant harm, or there may be a criminal prosecution, the local authority children's Social Care services, or the Police as appropriate, will consider what support the pupil(s) involved may need.

Initial Discussion with the local authority Designated Officer (LADO)

The purpose of an initial discussion is for the LADO and the Case Manager Headteacher/Principal to consider the nature, content and context of the allegation and agree to a course of action. The LADO may ask the Case Manager to provide or obtain relevant additional information, such as previous history, whether the pupil or their family have made similar allegations previously and about the alleged individual's current contact with pupils/other children.

There may be situations when the Case manager will want to involve the Police immediately, for example if the person is deemed to be an immediate risk to pupils/other children or there is evidence of a possible criminal offence. Where there is no such evidence, the Case Manager should discuss the allegations with the LADO in order to help determine whether Police involvement is necessary.

The Case Manager should then consider, with the LADO, what action should follow both in respect of the individual and those who made the initial allegation.

Decisions
No further action

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern, in which case this decision and a justification for it should be recorded by both the Case Manager and the LADO and agreement reached on what information should be put in writing to the individual concerned and by whom.

Further internal action

Situations can arise where the LADO is contacted, but advises that, whilst the matter does/does not reach threshold for a referral to them, it should be managed internally as a conduct issue; an internal investigation will be usually undertaken (see below). In these situations, the Headteacher/Principal/Principal/Case Manager will be supported by HR colleagues, and ER processes will commence, with the RSL supporting as needed.

Where there are concerns about the welfare of other children in the community or the member of staff's family, they will discuss these concerns with the LADO. It may be necessary for either the DSL or the LADO to make a referral to the local authority children's Social Care.

Registered Provision (only) - Registered providers must inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after pupils at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere). Registered providers must also notify Ofsted of the action taken in respect of the allegations. These notifications must be made as soon as is reasonably practicable, but at the latest within 14 days of the allegations being made. A registered provider who, without reasonable excuse, fails to comply with this requirement, commits an offence.

Multi-Agency Strategy Discussion

Where a referral to the LADO **has** met threshold, and where there is cause to suspect a pupil/child is suffering or is likely to suffer significant harm, a 'Strategy Discussion' will be convened by the LADO or the Police in accordance with the statutory guidance Working Together to Safeguard Children.

If the allegation is about physical contact, the 'strategy discussion' or initial evaluation with the Police will take into account that teachers and other school staff can lawfully make physical contact but only use restrictive interventions, including the use of reasonable force in circumstances where there is a risk of danger/harm to a pupil/staff. (see Use of Reasonable Force, Restrictive

Intervention and/or Restraint Policy, incorporating Screening, Searching and Confiscation Policy). Where a 'Strategy Discussion' is needed, or Police or local authority children's Social Care need to be involved, the Case Manager will **not** inform the accused person until those agencies have been consulted and have agreed what information can be disclosed to the accused, and what action has been decided.

Where it is clear that an investigation by the Police or local authority children's Social Care is unnecessary, or the 'Strategy Discussion' or initial evaluation decides that is the case, the LADO will discuss the next steps with the Case Manager. In those circumstances, the options open to the school depend on the nature and circumstances of the allegation and the evidence and information available. This will range from taking no further action (see above) to an internal school-based investigation (see below),

Internal school investigations

In some cases, whilst an investigation by the Police or local authority children's Social Care is unnecessary, the school will be guided by the agencies so that further enquiries will be needed to enable a decision about how to proceed. If so, the LADO will discuss with the Case Manager how and by whom the school investigation will be conducted. The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out by the school.

In straightforward cases, an internal school investigation will normally be undertaken by a senior member of school staff such as the DSL. Where necessary, due to lack of resource or conflict of interest, the investigation may be undertaken by a senior leader from another Cognita school. Should the nature of the allegation be very complex, the allegation will require the RSL to investigate/ appoint an independent investigator. Any independent investigator will be appointed by H of HR in conjunction with the ERM, the MD and the RSL. The outcome of the investigation must be fed back to the LADO.

Where a safeguarding concern or allegation triggers another procedure, such as grievance or disciplinary, that procedure shall only be followed once the immediate safeguarding concern or allegation has been fully investigated.

Risk assessment

Suspension

Suspension will not be an automatic response when an allegation is made- all options to avoid suspension will be considered prior to taking that step. The 'group' will consider carefully whether the circumstances of a case warrant a person being suspended from contact with pupils at the school or whether alternative arrangements can be put in place until the allegation or concern is resolved.

The possible risk of harm to pupils posed by an accused person should be evaluated and managed in respect of the pupil(s) involved in the allegations. In some rare cases, this will require the 'group' to consider suspending the accused until the case is resolved. .

Suspension will be considered only in a case where there is cause to suspect a pupil at the school are at risk of harm or the case is so serious that it might be grounds for dismissal.

In cases where the school is made aware that the Secretary of State has made an interim prohibition order in respect of an individual who works at the school, immediate action will be taken to ensure the individual does not carry out work in contravention of the order, i.e. pending the findings of the TRA investigation, the individual must not carry out teaching work.

The 'group' will also consider whether the result that would be achieved by immediate suspension could be obtained by alternative arrangements. In many cases an investigation can be resolved quickly and without the need for suspension.

If the LADO, Police and the local authority children's Social Care have no objections to the member of staff continuing to work during the investigation, the 'group' will aim to be as inventive as possible to avoid suspension.

Alternatives to suspension

Based on assessment of risk, the following alternatives will be considered by the 'group' before suspension:

- redeployment within the school so that the individual does not have direct contact with the pupil or pupil(s) concerned
- providing an assistant (e.g. another staff member) to be present when the individual has contact with pupils;
- redeploying to alternative work in the school so the individual does not have unsupervised access to pupils
- moving the pupil(s) to classes where they will not come into contact with the member of staff; this decision should only be made if it is in the best interests of the pupil (s) concerned and takes account of their views. It should be made clear, that this is not a sanction and parents/carers have been consulted or
- temporarily redeploying the member of staff to another role in a different location, for example to an alternative Cognita school

These alternatives allow time for an informed decision regarding the suspension and possibly reduce the initial impact of the allegation. This will, however, depend upon the nature of the allegation. The 'group' will consider the potential permanent professional reputational damage to adults that can result from suspension where an allegation is later found to be unfounded, unsubstantiated, malicious, or false .

A conversation with the 'group' will occur to reach a rounded decision about whether suspension is the correct course of action. If immediate suspension is considered necessary, the Case Manager must record the rationale and justification for such a course of action. This must also include what alternatives to suspension have been considered and why they were rejected.

Where it has been deemed appropriate to suspend the adult, written confirmation will be dispatched to them within one working day, giving as much detail as appropriate for the reasons for the suspension. Cognita will make clear to the suspended employee where they can obtain support. The adult will be informed at the point of their suspension who their named contact is within the organisation/school and will be given **their** contact details.

The local authority children's Social Care, the LADO or the Police cannot require the 'group' to suspend, although the 'group' will give appropriate weight to their advice. The power to suspend is vested in Cognita as proprietor of the school.

Where a 'Strategy Discussion' or initial evaluation concludes that there should be enquiries by local authority children's Social Care services and/or an investigation by the Police, the LADO should canvass Police and local authority children's Social Care services for views about whether the accused member of staff needs to be suspended from contact with pupil (s) in order to inform the school consideration of suspension. Police involvement does not make it mandatory to suspend a member of staff; this decision will be taken on a case-by-case basis having undertaken a risk assessment.

Support

The welfare of all pupils is paramount, and this will be the prime concern in terms of investigating an allegation against a person in a position of trust.

However, when an allegation or safeguarding concern is being investigated it may be a very stressful experience for the adult subject to the investigation, potentially for their family members, and any other staff involved as witnesses to any incident.

Cognita has a duty of care to their staff. Cognita will provide effective support for anyone facing an allegation, and/or other members of staff involved in the process as witnesses and will act to manage and minimise the stress inherent in the allegations process. It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer is dealt with very quickly, in a fair and consistent way that provides effective protection for the pupil and, at the same time, supports the person who is the subject of the allegation and any witnesses. Support for the accused individual is vital to fulfilling this duty.

Individuals will be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless there is an objection by the local authority children's Social Care or the Police. The individual will be advised to contact their trade union representative, if they have one.

The Case Manager will appoint a named representative to keep the person who is the subject of the allegation informed of the progress of the case and consider what other support is appropriate for the individual and/or witnesses. The accused adult will also be given access to an employee support service, provided by Cognita, and referred to occupational health by the HR department as needed.

Particular care needs to be taken when employees are suspended to ensure that they are kept informed of both the progress of their case and current work-related issues. Social contact with

colleagues and friends will not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

Timescales

It is in everyone's interest to resolve cases as quickly as possible and ensure consistency with a fair and thorough investigation. All allegations will be investigated as a priority to avoid any delay. The time taken to investigate and resolve individual cases depends on a variety of factors, including the nature, seriousness, and complexity of the allegation.

For cases where it is clear immediately that the allegation is unsubstantiated or malicious, it is aimed that they will be resolved within one week. Any concerns about safeguarding will always be discussed with the LADO.

Confidentiality

When an allegation is made, the school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act (2002) introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher in a school who has been accused by, or on behalf of, a pupil from the same school (where that identification would identify the teacher as the subject of the allegation). The reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State or the General Teaching Council for Wales publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions are disapplied if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so, or if a judge lifts restrictions in response to a request to do so. The provisions commenced on 1 October 2012.

The legislation imposing restrictions makes clear that "publication" of material that may lead to the identification of the teacher who is the subject of the allegation is prohibited. "Publication" includes "any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public." This means that a parent/carer who, for example, published details of the allegation on a social networking site, would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher by members of the public).

In accordance with the Authorised Professional Practice published by the College of Policing in May 2017, the Police will not normally provide any information to the press or media that might identify an individual who is under investigation, unless and until the person is charged with a criminal offence. In exceptional cases where the Police would like to depart from that rule, for example an appeal to trace a suspect, they must apply to a magistrates' court to request that reporting restrictions be lifted.

The Case Manager will take advice from the LADO, Police and the local authority children's Social Care services to agree the following:

- who needs to know and, importantly, exactly what information can be shared

- how to manage speculation, leaks and gossip
- what, if any, information can be reasonably given to the wider community to reduce speculation; and
- how to manage press interest if, and when, it should arise

Oversight and monitoring

The LADO has overall responsibility for oversight of the procedures for dealing with allegations, for resolving any inter-agency issues, and for liaison with Safeguarding Partners on the subject. The LADO will provide advice and guidance to the Case Manager, in addition to liaising with the Police and other agencies and monitoring the progress of cases to ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals, depending on the complexity of the case.

Police forces should also identify officers who will be responsible for:

- liaising with the LADO
- taking part in the Strategy Discussion or initial evaluation
- subsequently reviewing the progress of those cases in which there is a Police investigation; and
- sharing information on completion of the investigation or any prosecution.

If the 'Strategy Discussion' or initial assessment decides that a Police investigation is required, the Police should also set a target date for reviewing the progress of the investigation and consulting the Crown Prosecution Service (CPS) about whether to:

- charge the individual
- continue to investigate
- close the investigation

Wherever possible, that review should take place no later than four weeks after the initial evaluation. Dates for subsequent reviews, ideally at fortnightly intervals, should be set at the meeting if the investigation continues.

Information sharing

In a 'Strategy Discussion' or the initial evaluation of the case, the agencies involved will share all relevant information they have about the person who is the subject of the allegation, and about the alleged victim.

Where the Police are involved, wherever possible, the employer will ask the Police to obtain consent from the individuals involved to share their statements and evidence for use in the employer disciplinary process. This will be done as their investigation proceeds and will enable the Police to share relevant information without delay at the conclusion of their investigation or any court case.

The local authority children's Social Care should adopt a similar procedure when making enquiries to determine whether the pupil(s) named in the allegation are in need of protection or services, so that any information obtained in the course of those enquiries which is relevant to a disciplinary case can be passed to the employer without delay.

Following a criminal investigation or a prosecution

The Police should inform the employer and LADO immediately when a criminal investigation and any subsequent trial is complete, or if it is decided to close an investigation without charge, or not to continue to prosecute the case after the person has been charged. In those circumstances, the LADO should discuss with the Case Manager whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the Police and/or the local authority children's Social Care should inform that decision. The options will depend on the circumstances of the case, and the consideration will need to be given as to the result of the Police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

Outcome of an allegation

The following definitions will be used when determining the outcome of allegation investigations (including internal investigations):

Substantiated: there is sufficient evidence to prove the allegation

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

False: there is sufficient evidence to disprove the allegation

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence

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

On conclusion of a case

The options open to the school depend on the nature and circumstances of the allegation(s) and the evidence and information available. This will range from taking no further action, informal action, to internal Disciplinary processes, or a decision not to use the person's services in the future.

Substantiated allegations

If an allegation is substantiated and the person is dismissed, or the employer ceases to use the person's services, or the person resigns or otherwise ceases to provide his or her services, Cognita will refer the case to the DBS for consideration of whether inclusion on the barred lists is required. This is a

legal requirement for employers [Cognita] where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child. This referral is usually made on behalf of the school by HR.

In the case of a member of the teaching staff at a school, the matter will be referred to the TRA to consider prohibiting the individual from teaching in relation to their professional misconduct. This referral is usually made on behalf of the school by HR.

Unsubstantiated allegations

If an allegation is determined to be unsubstantiated or malicious, the RSL/LADO may advise the Headteacher/Principal/Principal/DSL to choose to refer the matter to local authority children's Social Care to determine whether the pupil concerned needs support services and/or may have been abused by someone else.

Malicious

If an allegation is shown to be deliberately invented or malicious, the Headteacher/Principal/Principal and the HoHR/ERM (on behalf of the proprietor Cognita) will consider whether any disciplinary action is appropriate against the pupil or staff member who made it; or whether the Police should be asked to consider if action might be appropriate against the person responsible, even if he or she were not a pupil.

Learning lessons

Throughout the handling of allegations and at the conclusion of a case in which an allegation is substantiated, the LADO will review the circumstances of the case with the Case Manager to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future. This will include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether suspension was justified. Lessons will also be learnt from the use of suspension when the individual is subsequently reinstated. The LADO and Case Manager, in collaboration with the 'group' where relevant, will consider how future investigations of a similar nature could be carried out without suspending the individual.

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

Returning to work

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the Headteacher/Principal /Principal alongside the Case Manager will consider how best to facilitate that. Most people will benefit from some help and support to return to work after a stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The Headteacher / Principal alongside the Case Manager will also consider how the person's contact with the pupil(s)/staff who made the allegation can best be managed if they are still a pupil/staff

member at the school. Likewise, those members of staff who have been witnesses during the processes must be supported.

Resignations and 'settlement agreements'

If the accused person resigns, or ceases to provide their services, this will not prevent an allegation being followed up in accordance with the statutory guidance KCSIE. A referral to the DBS and TRA must be made if the criteria are met (see criteria in KCSIE).

If the accused person resigns or their services cease to be used and the criteria are met, it will not be appropriate to reach a settlement/compromise agreement. Any settlement/compromise agreement that would prevent the proprietor from making a DBS referral even though the criteria for referral are met, is likely to result in a criminal offence being committed. This is because Cognita (the proprietor) would not be complying with its legal duty to make the referral (see above).

It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of pupils, including any in which the person concerned refuses to cooperate with the process. Wherever possible, the accused will be given a full opportunity to answer the allegation and make representations about it. However, the process of recording the allegation and any supporting evidence and reaching a judgement about whether it can be substantiated on the basis of all the information available, will continue even if that cannot be done or the accused does not cooperate. It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record a conclusion wherever possible.

Record keeping and Retention

Details of allegations that are found to have been malicious or false will be removed from personnel records unless the individual gives their consent for the retention of the information.

However, for all other allegations, i.e. substantiated, unfounded, and unsubstantiated, it is important that the following is kept on file of the person accused:

- a clear and comprehensive summary of the allegation
- details of how the allegation was followed up and resolved
- a note of any action taken and decisions reached and the outcome i.e. substantiated, unfounded, or unsubstantiated
- a copy provided to the person concerned, where agreed by the local authority children's Social Care/Police; and
- a declaration on whether the information will be referred to in any future reference

The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS checks reveal information from the Police about an allegation that did not result in a criminal

conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.

The record will be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation, if that is longer. The Information Commissioner Employment Practices Code provides some practical advice on record retention.

On occasion, records may be needed when Police investigate non-recent sexual allegations brought about by former pupils/staff.

The record must therefore be **retained in full.**

References

Cases in which an allegation was proven to be **false, unfounded, unsubstantiated or malicious** will not be included in employer references.

A history of repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated, or malicious will also not be included in any reference

Substantiated safeguarding allegations that meet the harms threshold should be included in references. provided that the information is factual and does not include opinions.

See KCSIE for further information on references.

C Whistleblowing

Please refer to the staff Whistleblowing Policy for more information.

Key Points

- Staff are encouraged to report to Cognita any suspected wrongdoing within our School or Cognita.
- Members of staff who raise genuine concerns under the Whistleblowing Policy will be supported, even if they turn out to be mistaken.
- Staff must not suffer any detrimental treatment (including dismissal, disciplinary action, threats, or other unfavourable treatment) as a result of raising a genuine concern.
- Staff should ordinarily report wrongdoing internally within Cognita. In most cases it will not be necessary to alert anyone externally.
- Reports made maliciously or in bad faith may lead to disciplinary action.
- Concerns raised under the Whistleblowing Policy are distinct from concerns or allegations about an adult's suitability to work with or have access to children.

All adults have a responsibility to report any concerns about poor or unsafe practice, including in relation to the care and protection of a pupil or pupils. If a member of staff believes that best practice in this area is not being adhered to or that practice may put a pupil or pupils at risk, they should first attempt to resolve their concern at school level via their Headteacher/Principal.

If the situation is not resolved, or the staff member is uncertain about whether something is within the scope of the Whistleblowing Policy, they should seek advice from the Whistleblowing Officer via whistleblowingofficer@cognita.com.

Staff are strongly encouraged to reach out at an early stage.

[Please see the 'key people and contacts' page in this document for the contact details of the above people within Cognita.]

Where an adult feels unable to raise a concern about poor safeguarding practice within Cognita through the above options or where they feel that their concern is not being addressed, they can raise their concern externally using either of the routes below:

Government guidance can be found here.

The NSPCC whistleblowing helpline is available for adults who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – lines are available from 8:00am to 8:00pm, Monday to Friday, or email: help@nspcc.org.uk

D Managing situations involving child-on-child abuse

Please see above Part 2 for more information about child-on-child abuse.

In some situations, a pupil will make a direct disclosure of child-on-child abuse, or their peers may report something has occurred. Alternatively, a staff member may raise a concern having witnessed or been told about an incident by a pupil or a parent/carer.

Staff

If a member of staff thinks for whatever reason that a pupil (s) may be at risk of abuse/exploitation from another pupil or young person, or a group of perpetrators, or that a pupil (s) may be abusing/exploiting others, the member of staff should report their concern **verbally** to the DSL **without delay** in accordance with this policy, recording their concern in writing after this.

Parents/carers

Parents/carers must be informed of all situations and referrals, unless to do so would heighten risk to the pupil/others.

Safeguarding Leads

The DSL will discuss the behaviour with the member of staff raising the concern and will in all situations, take any immediate steps to ensure the safety of the victim(s) or any other pupil (s)

including the perpetrator (s). Where the DSL considers or suspects that the behaviour might constitute abuse and/or exploitation, local authority children's Social Care should be contacted immediately, and if a criminal act is thought to have occurred, also the Police. Any response should be decided in conjunction with Social Care and other relevant agencies who will direct and advise once a referral has been received and accepted and should investigate the incident and the wider context and assess and mitigate the risk posed by the perpetrator(s) to the victim(s) and to other pupils.

Take steps to ensure the safety and wellbeing of any pupils affected

1. Whilst the school establishes the facts of the case and starts the process of liaising with local authority children's Social Care and the Police, the alleged pupil perpetrator(s) should be removed from any classes they share with the victim pupil. NB: Consideration will be given to suspending the perpetrator (s) at this point if for operational reasons, the pupil (s) cannot be separated/the risk is too high for either the victim, the perpetrator or other pupils

2. The school should also carefully consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on school premises (including during any before or after school-based activities) and on transport to and from the school, where appropriate. These actions are in the best interests of all pupils involved and should not be perceived to be a judgement on the guilt of the alleged perpetrator(s)

3. The school should consider that the abuse may indicate wider safeguarding concerns for any of the pupils involved

4. Treat all pupils (whether perpetrator or victim) as being at risk - while the perpetrator may pose a significant risk of harm to other pupils, they may also have considerable unmet needs and be at risk of harm themselves.

5. Take into account the complexity of child-on-child abuse and of pupil's experiences and consider the interplay between power, choice and consent. While pupils may appear to be making choices, if those choices are limited, they are not consenting

6. Take appropriate action in respect of the perpetrator (s) – any action should address the abuse, the causes of it, attitudes underlying it and the support that may be needed if the perpetrator is at risk.

7. Factors to consider include the risk the perpetrator(s) poses and will continue to pose to other pupils, their own unmet needs, the severity of the abuse and the causes of it.

Safeguarding Risk Assessments (Safety Plan)

A written Safeguarding Risk Assessment must be completed after the above initial practical steps are completed. This must be shared and co-constructed with the pupils involved, their parents/carers and the safeguarding team. Any risk assessment must be regularly reviewed.

The risk and needs assessment (including for a report of PSB, HSB, Sexual Harassment and/or Sexual Violence) must consider for each pupil involved, whatever their role (victim/perpetrator):

- the victim, their individual needs, their protection and support
- whether there may have been other victims and/or perpetrators
- the alleged perpetrator(s) individual needs, their protection and support
- all the other pupils who have not been directly involved but whom may be at potential risk, (and, if appropriate, staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms, and
- the time and location of the incident, and any action required to make the location safer (see below)

Following the incident

Perpetrator(s)

When any investigation has been completed, disciplinary action i.e. sanctions, in line with the Behaviour Policy may be appropriate, including

a) to ensure that the perpetrator takes responsibility for and realises the seriousness of their behaviour
b) to demonstrate to the perpetrator and others that abuse can never be tolerated; and
c) to ensure the safety and wellbeing of the victim and other pupils in the school.

Permanent exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the victim(s) and other pupils in the school;

Victim

Provide on-going support to victim(s) to including, but not limited to:

a) ensuring their immediate safety
b) responding promptly and appropriately to the abuse
c) assessing and addressing any unmet needs
d) following the procedures set out in this Safeguarding and Child Protection Policy (including where the pupil is in need of early help or statutory intervention)
e) monitoring the pupil's wellbeing closely and ensuring that they receive on-going support from all relevant staff members within the school
f) engaging with the pupil's parents/carers and any external agencies to ensure that the pupil's needs are met in the long-term

School community

The school should consider the lessons that can be learnt from the abuse and put in place measures to reduce the risk of such abuse recurring. This may include, for example: gender and equalities work, misogyny work around school safety, security and supervision, awareness raising for staff, pupils and parents/carers about a particular form of abuse, training for staff on handling certain types of incidents or abuse.

E Managing pupil situations involving the sharing of self-generated intimate imagery/videos, including those generated by AI (note this is also referred to as sharing nudes and semi-nudes)

Where the report includes an online element, staff should be aware of searching, screening and confiscation advice (for schools) (and the Use of Reasonable Force etc Policy) and UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people.

Staff must NEVER view or forward illegal images of a child/pupil. Should they receive such, then they should notify the DSL immediately. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the Police for inspection and subsequent removal. This will be the decision of the Police.

When an incident involving comes to a member of staff's attention:

- The incident must be referred to the DSL as soon as possible
- The DSL will follow the best practice procedures and guidance set out in this government guidance
- There should be interviews with the pupil (s) involved to gather further information (if appropriate, seek advice from the RSL/external agency eg Social Care/Police)
- Parents/carers of each pupil should be informed at an early stage and involved in the process (including prior to any further sensitive interviews with their child) unless there is good reason to believe that involving parents/carers would put the pupil at greater risk of harm and jeopardise any Police/ local authority Social Care enquiries
- At any point in the process, if there is a concern that a pupil (s) has been significantly harmed or is at risk of significant harm, a referral must be made to local authority children's Social Care and where a crime has been committed, the Police immediately. In these situations, the parents/carers must be informed, unless to do so may heighten any risk to the pupil/others.

F Managing situations involving PSB, HSB, Sexual Harassment and/or Sexual Violence

Advice on responding to children who display sexualised behaviour is available in Responding to children who display sexualised behaviour. Links to confidential specialist support are listed in Annex A of KCSIE.

All staff must be trained to manage a disclosure from a pupil around PSB, HSB, Sexual Harassment and/or Sexual Violence. They should seek advice and support from the DSL following any initial disclosure.

Any response to PSB, HSB, Sexual Harassment and/or Sexual Violence should be considered within the child protection context, and fall within, and be consistent with, the school's wider approach to child-on-child abuse (see above) whether the concerns of child-on-child PSB, HSB, Sexual Harassment and/or Sexual Violence, including those that have happened outside of the school premises, and/or online..

Recording

It may be appropriate to make notes during the discussion with any victim involved (ideally a second member of staff will be present). However, if making notes, staff should be conscious of the need to remain engaged with the pupil and not appear distracted by the note taking. Either way, it is essential a written record is made eventually (after immediate actions are taken) **only recording the facts** as the pupil presents them.

Schools should be aware that notes of such reports could become part of a statutory assessment by local authority children's Social Care and/or part of a criminal investigation by the Police.

The basic safeguarding principles in terms of actions are:

- all behaviours on this continuum must be considered within the child protection context
- responses should be proportionate and tailored on a case-by-case basis
- if a pupil says something that could indicate they have been harmed, or is at risk of harm, the school must make a referral to local authority children's Social Care
- if a pupil says something that suggests that they may be at imminent risk of harm or danger, local authority children's Social Care must be contacted immediately but also the Police
- rape, assault by penetration, sexual assaults, and/or upskirting are all crimes (see above) and must be reported to the Police immediately, including when the pupil is less than 10 years old followed by local authority children's Social Care. The following advice may help schools when to engage the Police and what to expect of them when they do: When to call the Police
- when responding to incidents that involve self-generated imagery/videos (commonly referred to as nudes and semi nudes), including those generated by AI, the legality of the incident must be reviewed, whilst using a proportionate approach that considers the age, development, and circumstances of the pupils involved, as well as any elements of coercion, exploitation or vulnerability. If there is any doubt, then the RSL should be consulted/Social Care

- if a pupil expresses that they are feeling unwell or have an injury due to what has occurred to them, they should receive medical assistance. However, all staff must be mindful not to remove any forensic evidence (for sexual violence i.e. criminal acts, seek advice from the authorities prior to intervention)
- the needs and wishes of the victim pupil (s) should be paramount (along with protecting the pupil(s) in any response, and they should never be made to feel they are a problem/made to feel ashamed for making the report
- the age and developmental stage of the victim pupil (s) and perpetrator (s) must be considered
- when assessing behaviours, particularly PSB/HSB, the ages and developmental stage of the children involved is critical (see above)
- parents/carers of the victim pupil must and will normally be informed of their child's disclosure at an early stage, and subsequent referrals to external agencies, including seeking their consent where required (unless this would put the victim at greater risk).
- the school should not speak to the alleged perpetrator (s) (or their parents/carers) in some situations *unless the authorities have stated that this is allowed* - this is because to interview a perpetrator where criminal offences may have occurred may jeopardise their enquiries
- any pupils who have witnessed the sexual violence may be traumatised and support must be offered
- written Safeguarding Risk Assessments (Safety Plans) must be put in place for both the victim and perpetrator for **all** cases of PSB, HSB, Sexual Harassment and/or Sexual Violence and reviewed every 4 weeks (or more regularly as required). These must consider classroom-based risks vs recreational time risks **plus** other risks such as online and transportation related. They must also consider any risks associated with 'live' or pending education visits which involve any pupil linked to the situation.
- sanctions/disciplinary processes involving the perpetrator can (and should be) be implemented on the 'balance of probabilities' in parallel with offering support. These can be undertaken whilst other investigations by the Police and /or local authority children's Social Care are ongoing (schools will seek agency advice about whether this would prejudice any investigation or any subsequent prosecution)
- if any pupil (s) involved change school, safeguarding records must be transferred in line with KCSIE
- schools must look out for potential patterns of concerning, problematic or inappropriate sexual behaviour in the school, and consider whether there are wider cultural issues that require targeted/whole school interventions
-

Managing situations

There are four likely scenarios that schools will need to manage:

Note: local authority procedures will dictate exactly how reports should be managed.

PSB, HSB, Sexual harassment, and/or Sexual Violence is never acceptable and will not be tolerated.

All concerns, discussions, decisions, and reasons for decisions, including why certain decisions have not been made must be recorded.

1 Internally:

PSB and HSB should always be considered within a child protection context. For example, for one-off incidents of PSB, HSB and/or Sexual Harassment (only) (dependant on what has occurred, and whether there have been any previous incidents), the school may take the view that the pupils concerned are not in need of Targeted Early Help provision (see above) nor that referrals need to be made to the local authority Social Care and that it would be appropriate to handle the incident internally in school, perhaps through utilising their Behaviour Policy and by providing pastoral support.

2 Those requiring Early Intervention*

*Schools must be familiar with, and work in line with their local safeguarding arrangement and thresholds (s*ee above).*

The school may decide that, whilst the pupils involved do not require referral to local authority children's Social Care (see below), they may benefit from early intervention. Early intervention encompasses providing support as soon as a problem emerges, at any point in a child's life. Providing early intervention is more effective in promoting the welfare of children than reacting later. Early intervention can be particularly useful to address non-violent PSB and also HSB, and may prevent escalation into Sexual Harassment and/or Sexual Violence

All concerns, discussions, decisions, and reasons for decisions, including why certain decisions have not been made must be recorded.

Targeted Early Help and Family Help

Some pupils and families may require more targeted support than that offered at the Universal and Community Based Early Help levels (see above for more information).

Targeted Early Help services, and those delivered through Family Help are coordinated by a local authority and/or their partners to address specific concerns within a family. Examples of these include parenting support, mental health support, youth services, youth offending teams and housing and employment services. Targeted Early Help may be appropriate for pupils and families who have multiple and or complex needs but also include those situations where PSB or HSB is emerging. It is a voluntary approach, requiring the family's consent.

As stated above, depending on the local authority, Family Help often now involves both Targeted Early Help **and** support and services delivered under s.17 of the Children Act 1989 (schools must check with their local authority). The aim of this is so that Lead practitioners (which may/may not include the school DSL) who begin working with families at the Targeted Early Help and Family Help stage can continue to lead work with families if the child is later assessed to be a child in need

as defined by Section 17 of the Children Act 1989 (the latter would have oversight from a Social Worker).

3 Those where local authority children's Social Care will need to be informed and involved:

Where a pupil has been harmed, is at risk of harm, or is in immediate danger, but a criminal offence may **not** have been committed, schools must make a referral to local authority children's Social Care. At the point of referral, schools will generally inform parents/carers, unless there are compelling reasons not to (if informing a parent/carer is going to put the pupil at additional risk). Any such decision should be made with the support of local authority children's Social Care. If a referral is made, local authority children's Social Care will then make enquiries to determine whether any of the pupils involved are in need of protection or other services.

Schools should not wait for the outcome (or even the start) of a Social Care investigation before protecting the victim and other pupils in the school which should be immediate. All concerns, discussions, decisions, and reasons for decisions, including why certain decisions have not been made must be recorded (written or electronic). Schools must liaise with local authority children's Social Care and any other agency involved so any actions do not jeopardise any statutory enquiry.

Should local authority children's Social Care, having received the school referral, decide that statutory intervention is not appropriate, the school must escalate or re-refer if they believe any pupil is at risk of harm or in danger (or if circumstances change).

4 Those where a criminal offence is likely to have occurred and the Police will be needed:

The DSL will lead the school's response to any incident where there is evidence that a criminal offence has occurred or is likely to occur. However, schools are not alone in dealing with Sexual Harassment and/or Violence. The Police will be important partner where it is thought that a crime might have been committed. Referrals to local authority children's Social Care will often be a natural progression of making a referral to the Police and will generally run in parallel. All concerns, discussions, decisions, and reasons for decisions, including why certain decisions have not been made must be recorded.

It is important for the DSL to explain to any pupil involved that the law is in place to protect all children and young people rather than criminalise them, and this should be explained in a way that avoids alarming or distressing them. Ultimately, the DSL will need to balance the victim's wishes against their duty to protect the victim and other pupils. The victim may ask the school not to tell anyone about the sexual violence or sexual harassment. If the DSL/DDSL decide to go ahead and make a referral to local authority children's Social Care and/or a report to the Police against the victim's wishes, this should be handled extremely carefully. There are no easy or definitive answers when a victim makes this request. The reasons should be explained to the victim and appropriate specialist support should be offered.

However, **where a report of rape, assault by penetration and/or sexual assault (see above) is made, or upskirting, the starting point is that this must be passed on to the Police.**

Whilst the age of criminal responsibility is ten, if the alleged perpetrator(s) is under ten, the starting principle of reporting to the Police remains.

Please also above regarding the need to have an 'Appropriate Adult present when Police are communicating with a vulnerable child as part of any criminal investigation under PACE (UK only). Please refer to KCSIE for information regarding bail conditions.

Informing parents/carers

Schools will generally inform parents/carers of the victim pupil unless there are compelling reasons not to, for example, if informing a parent/carer is likely to put a pupil at additional risk. It is best practice for the school to meet the victim's parents/carers *with the victim pupil present* to discuss what arrangements are being put in place to safeguard the victim and understand their wishes.

In circumstances where parents/ carers have not been informed, it will be especially important that the school is supporting the pupil in any decision they take. This should be with the support of local authority children's Social Care and any appropriate specialist agencies. The school must record all their actions clearly and advice taken from external agencies.

The school will take advice from local authority children's Social Care /Police when deciding when to inform the parents/carers of the alleged perpetrator, who will do this and what will be disclosed. It is best practice for the school to meet the perpetrator's parents/carers with their child present to discuss what arrangements are being put in place that may impact them e.g. moving them out of classes with the victim.

Confidentiality

Schools must do all they reasonably can to protect the anonymity of any pupils involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the pupils involved.

Support and sanction for the perpetrator

Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time. Our approach will be to implement preventative and/or forward-looking action to safeguard the victim.

It may also be that the perpetrator requires safeguarding, especially where there are concerns that a perpetrator themselves may have been a victim of abuse. It is important that the perpetrator(s) is/are also given the correct support to try to stop them from re-offending and to address any underlying trauma that may be causing this behaviour. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

The school may sanction (in line with the Behaviour Policy), any pupil whose conduct falls below the standard which could be reasonably expected of them, and disciplinary action may be taken whilst other investigations by the Police and/or local authority children's Social Care are ongoing. The fact that another body is investigating or has investigated an incident does not in itself prevent a school from coming to its own conclusion, on the balance of probabilities, about what happened, and imposing a penalty accordingly. This is a matter for the school and will be carefully considered on a case-by-case basis.

That said, the school will consider if, by taking any action, it would prejudice an investigation and/or any subsequent prosecution. Careful liaison with the Police and/or local authority children's Social Care will help the school make a determination. It will also be important to consider whether there are circumstances that make it unreasonable or irrational for the school to reach its own view about what happened while an independent investigation is considering the same facts.

Conviction/caution

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, in all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator(s) to remain in the same school would seriously harm the education or welfare of the victim (and potentially other pupils). The school should, if it has not already, consider any suitable sanctions in light of their behaviour policy, including consideration of permanent exclusion. However, where the perpetrator(s) is going to remain at the school, the principle would be to continue keeping the victim pupil and perpetrator(s) in separate classes and continue to consider the most appropriate way to manage potential contact on school premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

In some cases, rape, assault by penetration, sexual assault or sexual harassment are reported to the Police and the case is not progressed, or they are reported to the Police and ultimately result in a 'not guilty' verdict when the matter goes to trial. None of this means the offence did not happen or that the victim lied. The process will have affected both victim and alleged perpetrator(s). Appropriate support should be provided to both as required and consideration given to sharing classes and potential contact as required on a case-by-case basis. All of the above should be considered with the needs and wishes of the victim at the heart of the process (supported by parents/carers as required).

Any arrangements should be kept under review. In all cases, the school must record and be able to justify their decision-making.

G Managing situations involving mental health

The staff member identifying the emerging need should

- **Ask** the pupil how they are feeling, what support they need and want
- **Consider** the risk of harm to the pupil from self or others and try to reduce any immediate risk that is present (including summoning the First Aider/equivalent as required)
- **Listen** to the pupil and give them time to talk; give reassurance, and work with them on avenues of support
- **Tell** the DSL

What to do if there are concerns about a pupil's mental health

If staff have a mental health concern about a pupil, they should follow the above steps, dealing with any imminent medical risk as a priority. Should there also be safeguarding concerns about the pupil, then appropriate decisions will be made to safeguard the child by the DSL. Likewise, if there are safeguarding concerns about any pupil, consideration about how this may be impacting on the pupils mental health will be taken into consideration.

Clear actions for intervention will be decided, working in partnership with the parents/ carers (and external agencies if involved with consent). These interventions will be reviewed at every subsequent meeting, or before as the need arises, as is often the case with pupils who are experiencing poor or deteriorating mental health.

Parents/carers must always be contacted when signs/indicators of deteriorating/emerging mental health are first displayed (unless to do so would heighten the risk of harm to their child, in which case local authority children's Social Care will be contacted for advice).

Staged interventions

School interventions to promote positive mental health are more successful when pupils and their parents/carers participate in any decision making. Any interventions put in place by school staff to support pupils with their mental health are therefore planned, co-ordinated, targeted appropriately, then sustained and evaluated.

With regards to the support offered to pupils, please see below:

Universal support

We will support the emotional wellbeing of all pupils in partnership with their parents/carers, who hold main responsibility for meeting their child's needs.

Pastoral Support

Some pupils, in addition to the above, may require enhanced levels of *pastoral* support for their wellbeing in the form of informal daily or weekly check-ins with nominated staff.

Targeted support

For some pupils, enhanced pastoral support may not be enough to meet their emerging mental health needs. They will be given additional targeted support with nominated staff.

External Support

For some pupils, enhanced pastoral support and targeted support may not be enough to meet their need.

In these situations, the parents/carers of the child will be signposted to an external mental health agency/organization/professional/GP. Support may also be available via the local authority Targeted Early Help and Family Help levels of service. The school will make a referral to an external agency as required.

Hospitalisation

Where a pupil is admitted to hospital/a mental health facility, the school must always make a referral to local authority children's Social Care. Only when the school receive a letter from the treating medical practitioner saying that the pupil is well enough to attend school, will a return be discussed with the parents/carers. A reintegration meeting **must** take place prior to the pupil's reintegration, and their Safeguarding Risk Assessment updated (see below).

Language to use

The appropriate use of language when speaking to a pupil whose mental health is deteriorating, or when they express thoughts or plans to self-harm or attempt suicide is important.

Why language matters: rethinking the language of suicide | NSPCC Learning

When pupils are self-harming

Should an incident occur where a pupil has harmed themselves, first aid will be administered by the school's nominated First Aider and their parents/carers contacted, unless to do so will place the pupil potentially at greater risk of harm (in these situations, local authority children's Social Care and the RSL will be contacted for advice).

Should a more serious incident occur whereupon a pupil requires urgent medical assistance after harming themselves, an ambulance will be called immediately via 999, and the parents/carers contacted (unless to do so will place the pupil potentially at greater risk of harm).

When pupils have suicidal ideation

Should a pupil voice that they are considering / intending to harm themselves by taking their own life:

1. they will be 100% supervised by appropriately trained school staff immediately AND
2. their parents/carers will be called and asked to collect their child immediately from school. They will be advised to take their child to Accident and Emergency to have an urgent mental health assessment.
3. A school referral must be made to local authority children's Social Care and CAMHS (with the parent/carer consent). It is likely that CAMHS will be involved from the point of hospital attendance, but schools should not make that assumption.

When a pupil attempts suicide

Should an incident occur in school (or before they arrive at school, at home, or in the community) whereupon a pupil states that they have attempted to take their life and is unwell/injured, or is found in school to have attempted suicide, medical aid must be provided, and an ambulance must be called immediately via 999. The parents/carers contacted unless to do so will place the pupil potentially at greater risk of harm.

In the latter circumstance, an urgent referral must be made to local authority children's Social Care and CAMHS (with the parent/carer consent). It is likely that CAMHS will be involved from the point of hospital attendance, but schools should not make that assumption.

Safeguarding Risk Assessment (Safety Plan)

All pupils who have a diagnosed mental health illness, have self-harmed, and/or have suicidal ideation (or attempted to end their life) **must** have a Safeguarding Risk Assessment which is reviewed on a 4-week cycle (minimum).

The pupil's parents/carers must be informed of the above risk assessment and the control measures in place to keep their child as safe as possible whilst in school. The content of the risk assessment must also be shared with the pupil so that they know the support that has been put in place. Their wishes and feelings must be included in this risk assessment.

All Safeguarding Risk Assessments involving suicidal ideation and/or suicide attempt and /or and significant self-harming **must** be shared with the RSL.

When pupils are too unwell to attend school (temporary)

In some situations, akin to when a pupil is physically very unwell, the mental health needs of a pupil may be so serious that the school is unable to keep them safe on the school site despite a range of supportive interventions being attempted. Discussions about how interventions are managed are facilitated with the parents/carers at every step of their child's journey. If the pupil is too unwell to attend school, their absence will be coded as illness.

Any decision made about the pupil being unable to attend school may be a temporary measure until the pupil's mental health is medically assessed by a treating clinician as stable enough for them to safely return to school (this may be an immediate full return or a part-time timetable by

arrangement- if the latter, the school must ensure that they are using the correct DfE code). This medical assessment **must** be put in writing for the school, and in combination with the individual context and facilities of the school will inform the final decision prior to the pupil reintegrating.

When pupils are too unwell to attend school (permanent decision)

In a very small minority of situations, despite a range of supportive interventions attempted, a pupil's mental health needs and associated behaviours are such that the school can no longer keep them safe on the school site in the longer term. A decision may be made by the school, after seeking advice and support from the Cognita legal team and MD) that the school is no longer not the most appropriate setting to meet the pupil's mental health needs. All avenues and options will be considered before this serious step is taken. The parents/carers will be supported in these rare situation to find alternative educational provision.

H Visiting speakers

Inviting visiting speakers to events can significantly enhance the educational experience by providing pupils with real-world insights and experiences. Speakers can broaden pupils' horizons by exposing them to diverse cultures, communities, and forms of knowledge, enriching their understanding beyond the classroom. Sessions can also foster skill development, connecting academic concepts with real-world applications, helping pupils understand how theoretical knowledge translates to professional practice. These benefits contribute to a more comprehensive and engaging education experience, preparing pupils for their future careers and personal growth. The school's responsibility to pupils is to ensure that they can critically assess the information that they receive as to its value to themselves, and that such information is aligned to the ethos and values of the school and British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

The school has clear protocols for ensuring that any visiting speakers are suitable.

All requests for visits from visiting speakers must firstly be discussed and agreed with the Headteacher/Principal.

Prior to this agreement, the school will:

- complete through due diligence before agreeing to a visiting speaker attending the school - this will take into account any vetting requirements considered appropriate and may include a DBS check (if relevant).
- conduct research on the visiting speaker and/or their organisation, including social media checks
- not use a visiting speaker where any link is found to extremism, such as extremist groups and movements
- be satisfied, that the speaker is not in any way contrary to the school's Equality Objectives, its ethos of inclusion, and/or British Values

- be cautious when considering organisations with strong partisan views on contested topics, or that perpetuate stereotypes or encourage people to question their gender.

Prior to the visiting speaker session, the school will:

- meet with the visiting speaker to share the school's expectations of the session
- discuss the planned content of the session and how this will be delivered, including any use of IT
- request a copy of the visiting speaker's presentation and/or footage in advance of the session
- ensure that activities are properly embedded in the curriculum and clearly mapped to schemes of work to avoid contradictory messages or duplication
- ensure that the speaker's planned content:
  - is appropriate for the age and maturity of the pupils to be in attendance
  - does not undermine British values or the ethos and values of the school
  - does not marginalise any communities, groups or individuals
  - does not seek to glorify or incite hatred, misogyny, criminal activity and/or violence
  - does not seek to radicalise students through extreme or narrow views of faith, religion or culture or other ideologies
  - does not contain strong partisan views on contested topics, or that perpetuate stereotypes or encourage people to question their gender

- inform the speaker that school staff have the right and responsibility to interrupt and/or stop their presentation if it challenges the above requirements
- ensure that the visiting speaker is aware that they must not take photos of the pupils on any personal devices, and/or without permission
- ensure that the visiting speaker is made aware of appropriate dress, language, and behaviour
- ensure that the speaker knows and understands the school safeguarding procedures and the Code of Conduct, including the use of personal phones and wearing of smart devices
- review/vet any literature* that the speakers will provide, in terms of content and quality, prior to making this available to pupils

*Promotional literature which addresses political issues belonging to any visiting speaker will not be made available to pupils.

During the visit, the school will:

- ensure that the visiting speaker shows an original current identification document (which includes a photograph), signs into the schools entry system, and is given a visitor's lanyard
- ensure that the visiting speaker is given a 'visitors leaflet' which gives them information on safeguarding and emergency procedures in school
- supervise any visiting speaker at all times during their visit (by a member of permanent staff)

- ensure that no visiting speaker is ever with a pupil on a one-to-one basis
- ensure that the visiting speaker does not use any device that is prohibited (see above Online Safety)

In the unlikely event that the talk/presentation does not meet the above requirements in terms of content and delivery, school staff must interrupt and/or stop a presentation.

Whilst a balance must be struck and alternative viewpoints always taught, visiting speakers may include representatives of political parties or campaigning organisations (ISS 2026). Visiting speakers are not permitted to raise or gather funds for any external organisation or cause without express permission from the Headteacher/Principal.

I Organisations or Individuals Letting School Premises

Schools have a duty to ensure that appropriate arrangements are in place to keep pupils safe when allowing outside organisations to use their facilities. If the activity is being run by the school, or overseen by the school, then this policy and the school's procedures apply. If not, and the school is renting out their space to an organisation or individual, then the school must seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed) **and** ensure that there are arrangements in place for the provider to liaise with the school on these matters where appropriate. This applies regardless of whether or not the pupils who attend any of these services or activities are children on the school roll. Guidance around keeping children safe in out of school settings can be found here. This document details the safeguarding arrangements that schools should expect these providers to have in place, and schools must check that any hirers have met this guidance.

Should the organisation wishing to use the school premises **not** have any safeguarding policies or procedures in place, then the organisation must not be allowed to let the facilities. The school should also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

Schools may receive an allegation relating to an incident that happened when an individual or organisation was hiring their school premises for the purposes of running activities for pupils (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, schools should follow this policy and process (see above).

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	Disciplinary Policy Social Media Policy Personal and Professional Boundaries Policy Drug and Alcohol Policy Whistleblowing Policy RSHE Policy Group Safeguarding Governance and Oversight Policy