**Swain House Primary School**

**Child Protection and Safeguarding Policy**



**September 2025**

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Reviewed and agreed by Governors on

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**Statement of intent**

Swain House Primary School is committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil, both inside and outside of the school premises. We implement a whole-school preventative approach to managing safeguarding concerns, ensuring that the wellbeing of pupils is at the forefront of all action taken.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance. It will be achieved by:

* Ensuring that members of the Governing Body, the Headteacher and staff understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to the DSL.
* Teaching pupils how to keep safe and recognise behaviour that is unacceptable.
* Identifying and making provision for any pupil that has been subject to, or is at risk of, abuse, neglect, or exploitation.
* Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
* Ensuring that the Headteacher and any new staff and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.

The DSL is Claire Broomfield. In the absence of the DSL, child protection matters will be dealt with by the deputy DSL, Clare Pugh.

**Equality statement**

* Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children’s diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.
* We give special consideration to children who:
* Have special educational needs and disabilities (SEND) or health conditions
* Are young carers
* May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
* Have English as an additional language (EAL)
* Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
* Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
* Are asylum seekers
* Are at risk due to either their own or a family member’s mental health needs
* Are looked after or previously looked after
* Are missing or absent from education for prolonged periods and/or frequently
* Whose parent/carer has expressed an intention to remove them from school to be home educated

**Acronyms**

This policy contains a number of acronyms used in the Education sector. These acronyms are listed below alongside their descriptions.

|  |  |  |
| --- | --- | --- |
| **Acronym** | **Long form** | **Description** |
| AI | Artificial intelligence | Computer systems and software that are able to perform tasks that ordinarily require human intelligence, such as decision-making and the creation of images. |
| CCE | Child criminal exploitation | A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence. |
| CSCS | Children’s social care services | The branch of the local authority that deals with children’s social care. |
| CSE | Child sexual exploitation | A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence. |
| DBS | Disclosure and Barring Service | The service that performs the statutory check of criminal records for anyone working or volunteering in a school. |
| DfE | Department for Education | The national government body with responsibility for children’s services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England. |
| DPO | Data protection officer | The appointed person in school with responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK GDPR and Data Protection Act. |
| DSL | Designated safeguarding lead | A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the school. |
| EEA | European Economic Area | The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland). |
| EHC plan | Education, health and care plan | A funded intervention plan which coordinates the educational, health and care needs for pupils who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the pupil. |
| FGM | Female genital mutilation | All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences. |
| UK GDPR | UK General Data Protection Regulation | Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent. |
| HBA | ‘Honour-based’ abuse | So-called ‘honour-based’ abuse involves crimes that have been committed to defend the honour of the family and/or community. |
| HMCTS | HM Courts and Tribunals Service | HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice. |
| IICSA | Independent Inquiry into Child Sexual Abuse | The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours. |
| KCSIE | Keeping children safe in education | Statutory guidance setting out schools and colleges’ duties to safeguard and promote the welfare of children. |
| LA | Local authority | A local government agency responsible for the provision of a range of services in a specified local area, including education. |
| LAC | Looked-after children | Children who have been placed in local authority care or where children’s services have looked after children for more than a period of 24 hours. |
| LGBTQ+ | Lesbian, gay, bisexual, transgender, queer or questioning plus | Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities. |
| LMT | Leadership and Management Team | Staff members who have been delegated leadership responsibilities in a school. |
| NPCC | The National Police Chiefs’ Council | The National Police Chiefs’ Council is a national coordination body for law enforcement in the United Kingdom and the representative body for British police chief officers. |
| PLAC | Previously looked-after children | Children who were previously in local authority care or were looked after by children’s services for more than a period of 24 hours. PLAC are also known as care leavers. |
| PSHE | Personal, social and health education | A non-statutory subject in which pupils learn about themselves, other people, rights, responsibilities and relationships. |
| RSHE | Relationships, sex and health education | A compulsory subject from Year 7 for all pupils. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships. |
| SCR | Single central record | A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend the school in a non-visitor capacity. |
| SENCO | Special educational needs coordinator | A statutory role within all schools maintaining oversight and coordinating the implementation of the school’s special educational needs policy and provision of education to pupils with special educational needs. |
| TRA | Teaching Regulation Agency | An executive agency of the DfE with responsibility for the regulation of the teaching profession. |
| VSH | Virtual school head | Virtual school heads are in charge of promoting the educational achievement of all the children looked after by the local authority they work for, and all children who currently have, or previously had, a social worker. |

**Definitions**

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

For the purposes of this policy, **“safeguarding and protecting the welfare of children”** is defined as:

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

For the purposes of this policy, **“consent”** is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity, and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

For the purposes of this policy, **“sexual violence”** refers to the following offences as defined under the Sexual Offences Act 2003:

* **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
* **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.
* **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
* **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

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

* Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling
* Sexual “jokes” and taunting
* Physical behaviour, such as deliberately brushing against someone, interfering with someone’s clothes, and displaying images of a sexual nature
* Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence.

This includes:

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

For the purposes of this policy, **“upskirting”** refers to the act, as identified the Voyeurism (Offences) Act 2019, of taking a picture or video under another person’s clothing, without their knowledge or consent, with the intention of viewing that person’s genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including pupils and staff, of any gender can be a victim of upskirting.

For the purposes of this policy, the **“consensual and non-consensual sharing of nude and semi-nude images and/or videos”**, colloquially known as **“sexting”**, and collectively called **“youth-produced sexual imagery”** is defined as the creation of sexually explicit content by a person under the age of 18 that is shared with another person under the age of 18. This definition does not cover persons under the age of 18 sharing adult pornography or exchanging messages that do not contain sexual images.

“**Deep fakes**” and “**deep nudes**” refer to digitally manipulated and AI-generated nudes and semi-nudes.

For the purposes of this policy, **“indecent imagery”** is defined as an image which meets one or more of the following criteria:

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

Indecent images also include indecent **“pseudo-images”**, which are images have been created or manipulated using computer software and/or AI.

For the purposes of this policy, **“abuse”** is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

For the purposes of this policy, **“physical abuse”** is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

For the purposes of this policy, **“emotional abuse”** is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child the opportunities to express their views, deliberately silencing them, ‘making fun’ of what they say or how they communicate. It may feature age- or developmentally inappropriate expectations being imposed on children, such as interactions that are beyond their developmental capability, 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 the child to frequently 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, but it may also occur alone.

For the purposes of this policy, **“sexual abuse”** is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

For the purposes of this policy, **“neglect”** is defined as the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in serious impairment of a child’s health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

# 1. Legal framework

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

**Legislation**

* Children Act 1989
* Sexual Offences Act 2003
* Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
* Children Act 2004
* Safeguarding Vulnerable Groups Act 2006
* Apprenticeships, Children and Learning Act 2009
* Equality Act 2010
* The Education (School Teachers’ Appraisal) (England) Regulations 2012 (as amended)
* Anti-social Behaviour, Crime and Policing Act 2014
* Counter-Terrorism and Security Act 2015
* The UK General Data Protection Regulation (UK GDPR)
* Data Protection Act 2018
* Voyeurism (Offences) Act 2019
* Domestic Abuse Act 2021
* Marriage and Civil Partnership (Minimum Age) Act 2022

**Statutory guidance**

* Home Office (2023) ‘Prevent duty guidance: Guidance for specified authorities in England and Wales’
* DfE (2023) ‘Working Together to Safeguard Children 2023’
* DfE (2018) ‘Disqualification under the Childcare Act 2006’
* DfE (2025) ‘Keeping children safe in education 2025’
* HM Government (2020) ‘Multi-agency statutory guidance on female genital mutilation’
* HM Government (2023) ‘Channel Duty Guidance: Protecting people susceptible to radicalisation’
* Home Office and Foreign, Commonwealth and Development Office (2023) ‘Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage’

**Non-statutory guidance**

* DfE (2015) ‘What to do if you’re worried a child is being abused’
* DfE (2017) ‘Child sexual exploitation’
* DfE (2025) ‘Filtering and monitoring standards for schools and colleges’
* DfE (2024) ‘Information sharing’
* DfE (2024) ‘Sharing nudes and semi-nudes: advice for education settings working with children and young people’
* DfE (2021) ‘Teachers’ Standards’
* DfE (2024) ‘Recruit teachers from overseas’
* DfE (2025) ‘Meeting digital and technology standards in schools and colleges’
* DfE (2024) ‘Working together to improve school attendance’
* DfE (2024) ‘Meeting digital and technology standards in schools and colleges’
* Department of Health and Social Care (2024) ‘Virginity testing and hymenoplasty: multi-agency guidance’

This policy operates in conjunction with the following school policies:

* Attendance Policy
* Anti-bullying Policy
* Suspension and Exclusion Policy
* Online Safety Policy
* Mobile Phone Policy
* Staff Acceptable Use Policy
* Data Protection Policy
* LAC Policy
* Whistleblowing Policy
* Safer Recruitment Policy
* Staff Code of Conduct
* Behaviour Policy
* Staff Disqualification Declaration Form
* Reporting Safeguarding Concerns Flowchart
* Prevent Duty Risk Assessment
* Child-on-Child Abuse Policy
* SEMH Policy
* Cyber Security Policy
* Children Missing from Education Policy
* Allegations of Abuse Against Staff Policy
* Low Level Concerns Policy

# 2. Roles and responsibilities

All staff have a responsibility to:

* Consider, at all times, what is in the best interests of the pupil.
* Maintain an attitude of ‘it could happen here’ where safeguarding is concerned.
* Provide a safe environment in which pupils can learn.
* Be prepared to identify pupils who may benefit from early help.
* Be aware of the school’s systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
* Be aware of the role and identity of the DSL and deputy DSLs.
* Undertake safeguarding training, including online safety training (which, amongst other things, includes an understanding of the expectations and responsibilities relating to filtering and monitoring), during their induction – this will be regularly updated.
* Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
* Be aware of the local early help process and understand their role in it.
* Be aware of, and understand, the process for making referrals to CSCS, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
* Make a referral to CSCS and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
* Support social workers in making decisions about individual children, in collaboration with the DSL.
* Be aware of and understand the procedure to follow in the event that a child confides they are being abused, exploited or neglected.
* Be aware that a pupil may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
* Promote dialogue and understanding, and ensure all pupils feel listened to and understood.
* Empower pupils and allow them to understand their rights to safety and privacy, and to help them understand what they can do to keep themselves protected from harm.
* Avoid victim-blaming attitudes, and challenge it in a professional way if it occurs.
* Maintain appropriate levels of confidentiality when dealing with individual cases.
* Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
* Speak to the DSL if they are unsure about how to handle safeguarding matters.
* Be aware of safeguarding issues that can put pupils at risk of harm.
* Be aware of behaviours that could potentially be a sign that a pupil may be at risk of harm.

Teachers, including the Headteacher, have a responsibility to:

* Take strategic leadership responsibility for the school’s safeguarding arrangements.
* Safeguard pupils’ wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the ‘Teachers’ Standards’.
* Personally report any cases to the police where it appears that an act of FGM has been carried out, also referred to as ‘known’ cases, as soon as possible.

The Governing Body will work with the Headteacher and DSL to:

* Ensure there is a whole-school approach to safeguarding and that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
* Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Headteacher to account for its implementation
* Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school’s local multi-agency safeguarding arrangements
* Appoint a link governor to monitor the effectiveness of this policy in conjunction with the full Governing Body. This is always a different person from the DSL
* Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated
* Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness.

This includes:

* Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
* Reviewing the DfE’s filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

Make sure:

* The DSL has the appropriate status and authority to carry out their job
* Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
* The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
* The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors).
* That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):

* Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
* Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

All Governors will read Keeping Children Safe in Education in its entirety.

The Headteacher

The Headteacher is responsible for the implementation of this policy, including:

* Ensuring that staff (including temporary staff) and volunteers:
  + Are informed of our systems that support safeguarding, including this policy, as part of their induction
  + Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
* Communicating this policy to parents/carers when their child joins the school and via the school website
* Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
* Acting as the ‘case manager’ in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
* Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
* Ensuring the relevant staffing ratios are met, where applicable
* Making sure each child in the Early Years Foundation Stage is assigned a key person
* Overseeing the safe use of technology, and devices like mobile phones and cameras in the setting

The DSL

The DSL is a member of the senior leadership team. Our DSL is Claire Broomfield, Deputy Headteacher. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

Outside of school hours, the DSL can be contacted on [claire.broomfield@swainhouse.bradford.sch.uk](mailto:claire.broomfield@swainhouse.bradford.sch.uk)

When the DSL is absent, the Deputy DSLs will act as cover and can be contacted on [clare.pugh@swainhouse.bradford.sch.uk](mailto:clare.pugh@swainhouse.bradford.sch.uk)

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

* Provide advice and support to other staff on child welfare and child protection matters
* Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
* Contribute to the assessment of children
* Refer suspected cases, as appropriate, to the relevant body (local authority children’s social care, Channel programme, Disclosure and Barring Service (DBS), and/or police), and support staff who make such referrals directly
* Have a good understanding of harmful sexual behaviour
* Have a good understanding of the filtering and monitoring systems and processes in place at our school
* Make sure that staff have appropriate Prevent training and induction

The DSL will also:

* Keep the Headteacher informed of any issues
* Liaise with local authority case managers and designated officers for child protection concerns as appropriate
* Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
* Be aware that children must have an ‘appropriate adult’ to support and help them in the case of a police investigation or search

# 3. Multi-agency working

The school contributes to multi-agency working as part of its statutory duty. The school is aware of and will follow the local safeguarding arrangements.

The school will be fully engaged, involved, and included in the child-centred approach towards local safeguarding arrangements. Once the school is named as a relevant agency by local safeguarding partners (Bradford Local Authority, West Yorkshire Police and Bradford District and Craven Health and Care Partnership - ICB), it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies.

The school will develop trusting relationships between families and agencies to protect the welfare of its pupils, through the early help process and by contributing to multi-agency plans to provide additional support.

Where a need for early help is identified, the school will allow access for CSCS from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.

The school will also be mindful of the importance of inter-agency working in identifying and preventing CSE.

The school will reflect the DfE’s expectations to secure strong multi-agency working by:

* Collaborating with services to achieve shared goals and share information.
* Learning from evidence and sharing perspective to evaluate provision.
* Prioritising and sharing resources depending on pupils’ needs.
* Celebrating inclusivity and diversity and challenging discrimination.
* Mutually and constructively challenging other’s assumptions in a respectful manner.

**Information sharing**

The school recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet pupils’ needs and identify any need for early help.

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

Staff members will be made aware that safeguarding partners may take legal action against them if they do not share specified information when a request is made for the purposes of safeguarding.

Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils. If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSLs.

**4. Early help**

Early help means providing support as soon as a problem emerges, at any point in a child’s life. The school will be proactive in ensuring that every pupil is able to access full-time education to aid their development and protect them from harm whilst utilising the unique position of having regular daily contact with pupils to identify concerns as early as possible.

Any pupil may benefit from early help, but in particular, staff will be alert to the potential need for early help for pupils who:

* Are disabled, have certain health conditions, or have specific additional needs
* Have SEND, regardless of whether they have a statutory EHC plan
* Are suffering from mental ill health
* Are young carers
* Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
* Are frequently missing or going missing from care or from home
* Are at risk of modern slavery, trafficking, or sexual or criminal exploitation
* Are at risk of being radicalised
* Have family members in custody or is affected by parental offending.
* Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse
* Are misusing drugs or alcohol
* Are at risk of HBA, such as FGM or forced marriage
* Are privately fostered
* Have experienced multiple suspensions and are at risk of, or have been, permanently excluded from school, alternative provision or a PRU

The school will not limit its support to pupils affected by the above and will be mindful of a variety of additional circumstances in which pupils may benefit from early help, for example, if they are:

* Bereaved
* Viewing problematic or inappropriate online content or developing inappropriate relationships online
* Have recently returned home to their family from care
* Missing education, or are persistently absent from school, or not in receipt of full-time education

Staff will be mindful of all signs of abuse, neglect and exploitation and use their professional curiosity to raise concerns to the DSL.

The DSL, or most appropriate DDSL, will take the lead where early help is required. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required.

Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to CSCS for assessment for statutory services if the pupil’s situation is not improving or is worsening.

Further information and an Early Help Assessment form can be found here: https://www.saferbradford.co.uk/resources/childrens/prevention-and-early-help/#:~:text=Children's%20Initial%20Contact%20Point%20%2D%2001274,Duty%20Team%20on%2001274%20431010

Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to CSCS for assessment for statutory services if the pupil’s situation is not improving or is worsening.

**5. Abuse, neglect and exploitation**

All staff will be aware of the indicators of abuse, neglect and exploitation and will understand that children can be at risk of harm inside and outside of the school, inside and outside of the school, inside and outside of home, and online. Staff will also be aware that pupils can be affected by seeing, hearing or experiencing the effects of abuse.

The school will recognise that abuse or neglect of a child may occur through the infliction of harm or through the failure to act to prevent harm. The school will understand that harm can include ill treatment that is not physical in nature, as well as the psychological impact of witnessing the ill treatment of others.

The school will pay particular attention to the effects of domestic abuse on children, recognising that harm may arise not only when children are directly involved, but also when they see, hear, or otherwise experience its consequences. All necessary steps will be taken to identify and respond appropriately to such concerns in order to safeguard and promote the welfare of all pupils.

All staff will understand that abuse, neglect, exploitation and other safeguarding issues are rarely standalone events that can be given a specific definition or one label alone. Staff will understand that, in most cases, multiple issues will overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL.

All staff, especially the DSL and deputy DSLs, will be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments; this includes being aware that pupils can at risk of abuse or exploitation in situations outside their families (extra-familial harms). All staff will be aware of the appropriate action to take following a pupil being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

**6. Specific safeguarding issues**

There are certain specific safeguarding issues that can put children at risk of harm – staff will be aware of these issues.

[Appendix A](#Specificissues) of this policy sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues.

**7. Child-on-child abuse**

For the purposes of this policy, **“child-on-child abuse”** is defined as abuse between children.

The school has a zero-tolerance approach to abuse, including child-on-child abuse, as confirmed in the Child Protection and Safeguarding Policy’s [statement of intent](#_Statement_of_intent_1).

All staff will be aware that child-on-child abuse can occur between pupils of any age and gender, both inside and outside of school, as well as online. All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. All staff will speak to the DSL if they have any concerns about child-on-child abuse.

All staff will understand the importance of challenge inappropriate behaviour between peers, and will not tolerate abuse as “banter” or “part of growing up”.

Child-on-child abuse can be manifested in many different ways, including:

* Bullying, including cyberbullying and prejudice-based or discriminatory bullying
* Abuse in intimate personal relationships between peers – sometimes known as ‘teenage relationship abuse’
* Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse
* Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence
* Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse
* Causing someone to engage in sexual activity without consent
* The consensual and non-consensual sharing of nude and semi-nude images and/or videos
* Upskirting
* Initiation- and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group, and may also include an online element

Some children may be particularly vulnerable and have an increased risk of abuse. The school will recognise that children with SEND or certain health conditions are three times more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to child-on-child group isolation or bullying (including prejudice-based bullying) than other children. The school will consider extra pastoral support for those children.

All pupils have the right to be safeguarded from harm regardless of race, religion, ethnicity, age, gender, sexuality or disability. The school will give special consideration to, amongst others, children who:

• Have SEND

• Are vulnerable to being bullied

• Are looked after or living in unsupportive home situations

The DSL will ensure they appropriately assess all instances of child-on-child abuse, including in cases of image-based abuse, to help determine whether the alleged perpetrator(s) is under the age of 18 or is an adult posing as a child. The DSL will immediately refer the case if it is found that a so-called child-on-child abuse incident involves an adult, e.g. where an adult poses as a child online to groom a child or young person.

All staff will be clear as to the school’s policy and procedures regarding child-on-child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Pupils will also be reassured that they will be taken seriously, be supported, and kept safe.

The school’s procedures for managing allegations of child-on-child abuse are outlined in the Child-on-child Abuse Policy. Staff will follow these procedures, as well as the procedures outlined in the school’s Anti-bullying Policy and Suspension and Exclusion Policy, where relevant.

**8. Online safety and personal electronic devices**

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

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

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

* Pupil attitudes and behaviours which may indicate they are at risk of potential harm online
* The procedure to follow when they have a concern regarding a pupil’s online activity

Staff training in online safety will cover the four categories of risk as outlined in KCSIE:

* Content - Staff will be trained to understand the risks associated with being exposed to illegal, inappropriate, or harmful material. This will include, but not be limited to, content relating to pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation, and conspiracy theories.
* Contact - Training will address the risks of harmful online interaction with other users. This will include peer-to-peer pressure, exposure to commercial advertising, and the threat posed by adults impersonating children or young people with the intention of grooming or exploiting them for sexual, criminal, financial, or other purposes.
* Conduct - Staff will be made aware of how certain online behaviours may increase the likelihood of harm or result in actual harm. This will encompass activities such as creating, sending, or receiving explicit images, the distribution of other explicit material, and instances of online bullying.
* Commerce - The programme will also cover risks related to online commerce. These will include dangers such as online gambling, exposure to inappropriate advertising, phishing attempts, and other types of financial scams. Any concerns that pupils or staff may be at risk will be reported promptly to the Anti-Phishing Working Group or through appropriate safeguarding channels.

The school will ensure that appropriate filtering systems are in place on school devices and school networks to prevent children accessing inappropriate material, in accordance with the school’s Cyber-security Policy. The appropriateness of the school’s filters and monitoring systems will be informed by the Filtering and monitoring standards, the Cyber security standards for schools and colleges, and the risk assessment required by the Prevent Duty. The school will, however, ensure that the use of filtering and monitoring systems does not cause “over blocking”, which may lead to unreasonable restrictions as to what pupils can be taught online. The school will also ensure that it meets the filtering and monitoring standards published by the DfE.

Staff will be aware of the filtering and monitoring systems in place and will know how to escalate concerns where they are identified. Staff will be made aware of their expectations and responsibilities relating to filtering and monitoring systems during their induction.

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

**Communicating with parents**

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

The school will also make it clear to parents what their children are being asked to do online for school.

At Swain House Primary School, we use National Online Safety resources to communicate with parents regularly about specific online safeguarding issues.

**Reviewing online safety**

The school will carry out an annual review of its approach to online safety.

**Personal electronic devices**

The use of personal electronic devices, including mobile phones and cameras, by staff and pupils is closely monitored by the school, in accordance with the Online Safety Policy, Acceptable Use Policies and Mobile Phone Policy.

Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the school’s Data Protection Policy.

Where photographs and videos will involve pupils who are LAC, adopted pupils, or pupils for whom there are security concerns, the Headteacherwill liaise with the DSL to determine the steps involved. The DSL will, in known cases of pupils who are LAC or who have been adopted, liaise with the pupils’ social workers, carers or adoptive parents to assess the needs and risks associated with the pupils.

Staff will report any concerns about pupils’ or other staff members’ use of personal electronic devices to the DSL, following the appropriate procedures.

**Upskirting**

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

Upskirting will not be tolerated by the school. Any incidents of upskirting will be reported to the DSL, who will then decide on the next steps to take, which may include police involvement.

# 9. Consensual and non-consensual sharing of indecent images and videos

The school will ensure that staff are aware to treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as “sexting” or youth-produced sexual images) as a safeguarding concern.

Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes in the school community, including understanding motivations, assessing risks posed to pupils depicted in the images, and how and when to report instances of this behaviour.

Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that pupils are not unnecessarily criminalised.

Staff will also be made aware that the laws imposed on the sharing of nudes and semi-nudes applies to digitally manipulated and AI-generated imagery.

Where a member of staff becomes aware of an incidence of sharing nudes and/or semi-nudes, they will refer this to the DSL as soon as possible. The DSL will work to support the affected pupils and inform them of the reporting routes to remove a nude or semi-nude that has been shared online or to prevent an image from being shared online.

# 10. Context of safeguarding incidents

Safeguarding incidents can occur outside of school and can be associated with outside factors. All staff, particularly the DSL and deputy DSLs, will always consider the context of safeguarding incidents. Assessment of pupils’ behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. The school will provide as much contextual information as possible when making referrals to CSCS.

# 11. Pupils potentially at greater risk of harm

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

**Pupils who need social workers**

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

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

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

**Home-educated children**

Parents may choose elective home education (EHE) for their children. In some cases, EHE can mean that children are less visible to the services needed to safeguard and support them.

In line with the School Attendance (Pupil Registration) (England) Regulations 2024, the school will inform the LA of all deletions from the admissions register when a pupil is taken off roll.

Where a parent has expressed their intention to remove a pupil from school for EHE, the school, in collaboration with the LA and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the pupil has SEND, is vulnerable, and/or has a social worker.

**LAC and PLAC**

Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. PLAC, also known as care leavers, can also remain vulnerable after leaving care.

The Governing Body will ensure that staff have the skills, knowledge and understanding to keep LAC and PLAC safe. This includes ensuring that the appropriate staff have the information they need, such as:

* Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
* Contact arrangements with parents or those with parental responsibility.
* Care arrangements and the levels of authority delegated to the carer by the authority looking after the pupil.

The DSL will be provided with the necessary details of pupils’ social workers and the VSH, and, for PLAC, personal advisers.

Further details of safeguarding procedures for LAC and PLAC are outlined in the school’s LAC Policy.

**Pupils with SEND**

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

* Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil’s disability without further exploration; however, it should never be assumed that a pupil’s indicators relate only to their disability
* Pupils with SEND can be disproportionally impacted by issues such as bullying, without outwardly showing any signs
* Communication barriers may exist, as well as difficulties in overcoming these barriers

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

**Pupils who are lesbian, gay, bisexual or gender questioning**

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual, transgender, queer or gender questioning (LGBTQ+) can be targeted by other children.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting prepubertal children.

When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

**Pupils requiring mental health support**

All staff will be made aware that mental health problems can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation.

**12. Use of the school premises for non-school activities**

Where school hires or rents out school facilities or the school premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate safeguarding arrangements are in place to keep pupils safe. The school will refer to the DfE’s [guidance](https://www.gov.uk/government/publications/keeping-children-safe-in-out-of-school-settings-code-of-practice/keeping-children-safe-during-community-activities-after-school-clubs-and-tuition-non-statutory-guidance-for-providers-running-out-of-school-settings) on keeping children safe in out-of-school settings in these circumstances.

Where the Governing Body provides the activities under the direct supervision or management of school staff, child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, the Governing Body will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The Governing Body will also ensure that there are arrangements in place to liaise with the school on these matters where appropriate. The Governing Body will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement.

**Extracurricular activities and clubs**

External bodies that host extracurricular activities and clubs at the school, e.g. charities or companies, will work in collaboration with the school to effectively safeguard pupils and adhere to local safeguarding arrangements.

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

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

**13. Alternative provision**

The school will remain responsible for a pupil’s welfare during their time at an alternative provider. When placing a pupil with an alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff and will satisfy itself that the placement is meeting the pupil’s needs.

Those responsible for the commissioning of alternative provision will be aware that pupils in alternative provision will often have complex needs – they will be mindful of the additional risk of harm that these pupils may be vulnerable to.

**14. Work experience**

When a pupil is sent on work experience, the school will ensure that the provider has appropriate safeguarding policies and procedures in place. Where the school has pupils conduct work experience at the school, an enhanced DBS check will be obtained if the pupil is over the age of 16.

# 15. Private fostering

Where a period of UK homestay lasts 28 days or more for a child aged under 16, or under 18 for a child with SEND, this may amount to private fostering under the Children Act 1989. Where the school becomes aware of a pupil being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

# 16. Concerns about pupils – school procedures

If a member of staff, Governor, volunteer or visitor has any concern about a pupil’s welfare, or a pupil has reported a safeguarding concern in relation to themselves or a peer, they will act on them immediately by completing a yellow concern form (Appendix B) and hand it to the office to be logged and assigned to the DSL or one of the deputy DSLs.

**See Child Protection Flow Chart – Appendix C**

All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in the Communication and Confidentiality section of this policy.

Staff will be aware that pupils may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful. Staff will be aware that this must not prevent them from having professional curiosity and speaking to the DSL, or deputy DSL, if they have a concern about a pupil.

Remember that some children may:

* Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
* Not recognise their experiences as harmful
* Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

Where there are safeguarding concerns, the school will ensure that the pupil’s wishes are always taken into account, and that there are systems available for pupils to provide feedback and express their views. When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the pupil feels like they are being listened to and believed.

If a child makes a disclosure

If a child discloses a safeguarding issue to a member of staff, Governor, volunteer or visitor they should:

* Listen to and believe them. Allow them time to talk freely and not ask any leading questions
* Stay calm and do not show that you are shocked or upset
* Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
* Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
* Write up your conversation as soon as possible in the child’s own words on a yellow cause for concern form (these can be found in the main office). Stick to the facts, and do not put your own judgement on it
* Take the cause for concern form to the office where it will be logged then passed immediately to the DSL or DDSL
* Alternatively, if appropriate, make a referral to children’s social care and/or the police directly, and tell the DSL/DDSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

If a child is suffering or likely to suffer harm, or in immediate danger

* If a pupil is in immediate danger, a referral will be made to CSCS and/or the police immediately. If a pupil has committed a crime, such as sexual violence, the police will be notified without delay
* The DSL or DDSL will make a referral to children’s social care and/or the police immediately if they believe a child is suffering or likely to suffer from harm, or is in immediate danger. However, **Anyone can make a referral** – but if possible always speak to the DSL / DDSL first
* If a referral is made about a pupil by anyone other than the DSL, the DSL will be informed as soon as possible
* In the Bradford district, these are the numbers that you can ring for advice and to make a referral: During office hours (8.30am – 5pm Monday to Thursday, 4.30pm on Friday) call Children’s Social Services Initial Contact Point on 01274 433999
* For any safeguarding advice, contact the Education Safeguarding Team on 01274 437043
* At all other times, Social Services Emergency Duty Team on 01274 431010
* If you have reason to believe that a child is at IMMEDIATE RISK OF HARM, contact the police on 999

The LA will make a decision regarding what action is required within one working day of the referral being made and will notify the referrer. Staff are required to monitor a referral if they do not receive information from the LA regarding what action is necessary for the pupil. If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the pupil.

If early help is appropriate, the case will be kept under constant review. If the pupil’s situation does not improve, a referral will be considered. All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded by the DSL on CPOMs.

An inter-agency assessment will be undertaken where a child and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child and family require in preventing needs escalating to a point where intervention would be needed.

# 17. Managing referrals

The reporting and referral process outlined in the Reporting Safeguarding Concerns Flowchart will be followed accordingly.

All staff members, in particular the DSL, will be aware of the LA’s arrangements in place for managing referrals. The DSL will provide staff members with clarity and support where needed. When making a referral to CSCS or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the pupils involved. The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

Where a pupil has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.

The school will not wait for the start or outcome of an investigation before protecting the victim and other pupils: this applies to criminal investigations as well as those made by CSCS. Where CSCS decide that a statutory investigation is not appropriate, the school will consider referring the incident again if it is believed that the pupil is at risk of harm. Where CSCS decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as early help and pastoral support.

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

# 18. Concerns about school safeguarding practices

Any concerns regarding the safeguarding practices at the school will be raised with the LMT, and the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy. If a staff member feels unable to raise an issue with the LMT, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

# 19. Communication and confidentiality

When recording, holding, using and sharing information, the DSL will ensure that they:

* Understand the importance of information sharing, both within the school and with other schools on transfer including in-year and between primary and secondary education, and with safeguarding partners, other agencies, organisations and practitioners.
* Understand relevant data protection legislation and regulations, in particular the Data Protection Act 2018 and the UK GDPR.
* Are able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale of those decisions. This will include instances where referrals were and were not made to another agency such as LA children’s social care or the Prevent program.

All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with school data protection policies.

Where there is an allegation or incident of sexual abuse or sexual violence, the victim is entitled to anonymity by law; therefore, the school will consult its policy and agree on what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the school will do all it can to protect the anonymity of the pupils involved in the case.

Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis. During the disclosure of a concern by a pupil, staff members will not promise the pupil confidentiality and will ensure that they are aware of what information will be shared, with whom and why.

Where it is in the public interest, and protects pupils from harm, information can be lawfully shared without the victim’s consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime. Before doing so, the DSL will weigh the victim’s wishes against their duty to protect the victim and others. Where a referral is made against the victim’s wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.

Depending on the nature of a concern, the DSL will discuss the concern with the parents of the pupils involved. Discussions with parents will not take place where they could potentially put a pupil at risk of harm. Discussion with the victim’s parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report. Discussion with the alleged perpetrator’s parents will have regards to the arrangements that will impact their child, such as moving classes, with the reasons behind decisions being explained and the available support discussed. External agencies will be invited to these discussions where necessary.

Where confidentiality or anonymity has been breached, the school will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented.

Where a pupil is leaving the school, the DSL will consider whether it is appropriate to share any information with the pupil’s new provider, in addition to the child protection file, that will allow the new provider to support the pupil and arrange appropriate support for their arrival.

# 20. Safeguarding concerns and allegations of abuse against staff

All allegations against staff, supply staff, volunteers and contractors will be managed in line with the school’s Allegations of Abuse Against Staff Policy, a copy of which will be provided to, and understood by, all staff. The school will ensure all allegations against staff, including those who are not employees of the school, are dealt with appropriately and that the school liaises with the relevant parties.

When managing allegations against staff, the school will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as “low-level concerns”, as defined in the Allegations of Abuse Against Staff Policy. Allegations that meet the harms threshold include instances where staff have:

* Behaved in a way that has harmed a child, or may have harmed a child
* Committed or possibly committed a criminal offence against or related to a child.
* Behaved towards a child in a way that indicates they 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

**Low-Level Concerns**

A low-level concern is defined as any concern had about an adult’s behaviour towards, or concerning, a child that does not meet the harms threshold (see below) or is otherwise not serious enough to consider a referral at the time of its reporting.

The term ‘low-level’ concern does not mean that it is insignificant – a low-level concern is any concern that suggests an adult working in or on behalf of the school or college may have acted in a way that:

* Is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work
* Does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO

Inappropriate behaviour can exist on a wide spectrum, from inadvertent or thoughtless behaviour to behaviour which is ultimately intended to enable abuse. Examples of inappropriate behaviour that would constitute a low-level concern that should be reported to the Headteacher / DSL include, but are not limited to:

* Being overly friendly with children – this could include, but is not limited to, communicating with a child through personal social media or allowing inappropriate conversations or enquiries to occur with pupils, e.g. conversations that are about a staff member’s personal life or are of a sexual nature
* Having favourites – this could include, but is not limited to, calling pupils by pet names or terms of endearment or buying pupils gifts
* Taking photographs of children on their mobile phones, contrary to school policy
* Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
* Humiliating children

Low-level concerns will be handled in line with the schools’ Low-level Safeguarding Concerns Policy. Staff members will report their concerns to the Headteacher or the DSL by submitting a [Low-level Concern Reporting Form](#_Low-level_Concern_Reporting).

# 21. Safer recruitment

The school’s full policy and procedures for safer recruitment are outlined in the Safer Recruitment Policy.

An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in ‘regulated activity’ if, as a result of their work, they:

* Are responsible on a daily basis for the care or supervision of children.
* Regularly work in the school at times when children are on the premises.
* Regularly come into contact with children under 18 years of age.

The DfE’s [DBS Workforce Guides](https://www.gov.uk/government/publications/dbs-workforce-guidance) will be consulted when determining whether a position fits the child workforce criteria.

The Governing Body will conduct the appropriate pre-employment checks for al prospective employees, including internal candidates and candidates who have lived or worked outside the UK.

The appropriate DBS and suitability checks will be carried out for all governors, volunteers, and contractors.

**Staff suitability**

All centres providing care for pupils under the age of eight must ensure that staff and volunteers working in these settings are not disqualified from doing so under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018. A person may be disqualified if they:

* Have certain orders or other restrictions placed upon them.
* Have committed certain offences.

All staff members are required to sign the Staff Disqualification Declaration Form confirming that they are not disqualified from working in a schooling environment. A disqualified person will not be permitted to continue working at the school, unless they apply for and are granted a waiver from Ofsted. The school will provide support with this process.

**Ongoing suitability**

Following appointment, consideration will be given to staff and volunteers’ ongoing suitability – to prevent the opportunity for harm to children or placing children at risk.

**Referral to the DBS**

The school will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or they are suspended.

# 22. Single central record (SCR)

The school keeps an SCR which records all staff, including agency and third-party supply staff, and teacher trainees on salaried routes, who work at the school.

The following information is recorded on the SCR:

* An identity check
* A barred list check
* An enhanced DBS check
* A prohibition from teaching check
* A check of professional qualifications, where required
* A check to determine the individual’s right to work in the UK
* Additional checks for those who have lived or worked outside of the UK

For agency and third-party supply staff, the school will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that all the necessary checks have been conducted (i.e. all the same checks the school would perform on any individual working in the school or who will be providing education on the school’s behalf, including through online delivery) and the date that confirmation was received.

If any checks have been conducted for volunteers, this will also be recorded on the SCR. If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded.

Written confirmation that supply agencies have completed all relevant checks will also be included.

The school is free to record any other information it deems relevant.

The details of an individual will be removed from the SCR once they no longer work at the school.

# 23. Training

Staff members will undergo safeguarding and child protection training at induction, which will be updated regularly and/or whenever there is a change in legislation. A weekly ‘Safeguarding Question of the Week’ is sent to all staff each Monday and discussed at KS meetings each Wednesday. Information regarding the question is sent to all staff via email the following Monday.

The induction training will cover:

* The Child Protection and Safeguarding Policy.
* The Child-on-child Abuse Policy and procedures.
* The Staff Code of Conduct.
* Part one of ‘Keeping children safe in education’ (KCSIE) (or Annex A, if appropriate).
* The Behaviour Policy.
* The Children Absent from Education Policy, including the safeguarding response to children who are absent from education.
* Appropriate child protection and safeguarding training, including online safety training – which, amongst other things, includes an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring.
* Information about the role and identity of the DSL and deputy DSLs.

All staff members will also receive regular safeguarding and child protection updates as required, but at least annually. Training will cover, at a minimum:

* The issues surrounding sexual violence and sexual harassment
* Contextual safeguarding
* How to keep LAC and PLAC safe
* CCE and the need to refer cases to the National Referral Mechanism
* Updated online safety training

Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the school.

The DSL and deputy DSLs will undergo child protection and safeguarding training, and update this training at least every two years. The DSL and deputy DSLs will also obtain access to resources and attend any relevant or refresher training courses, ensuring they keep up-to-date with any developments relevant to their role. This will include training to understand:

* The assessment process for providing early help and statutory intervention, including local criteria for action and CSCS referral arrangements
* How LAs conduct child protection case conferences and a child protection review conferences, to enable the DSL to attend and contribute to these effectively when require
* The importance of providing information and support to CSCS
* The lasting impact that adversity and trauma can have
* How to be alert to the specific needs of children in need, pupils with SEND and/or relevant health conditions, and young carers
* The importance of internal and external information sharing
* The Prevent duty
* The risks associated with online safety, including the additional risks faced online by pupils with SEND

# 24. Monitoring and review

This policy is reviewed at least annually by the DSL and the Headteacher. This policy will be updated as needed to ensure it is up-to-date with safeguarding issues as they emerge and evolve, including any lessons learnt.

Any changes made to this policy will be communicated to all members of staff. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme. The next scheduled review date for this policy is September 2026.

Any child protection incidents at the school will be followed by a review of the safeguarding procedures within the school and a prompt report to the Governing Body. Where an incident involves a member of staff, the LADO will assist in this review to determine whether any improvements can be made to the school's procedures.

If any concerns are raised by the LADO or Ofsted about safeguarding issues, the following actions will be taken:

* The DSL carries out an investigation as a priority and comply with any deadlines given
* The Chair of the Governors reports to the LADO or Ofsted on the findings of the investigation and sets out any action to be taken
* The school endeavours to comply as soon as possible with any recommendations from the LADO or Ofsted

**Appendix A**

**Specific safeguarding issues**

This appendix sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues.

Here are the issues covered:

1. [Domestic abuse](#domesticabuse)
2. [Homelessness](#Homelessness)
3. [Children absent from education](#childrenmissinged)
4. [Child abduction and community safety incidents](#childabduction)
5. [Child criminal exploitation (CCE)](#cce)
6. [Cyber-crime](#cybercrime)
7. [Child sexual exploitation (CSE)](#cse)
8. [Modern slavery](#slavery)
9. [FGM](#fgm)
10. [Virginity testing and hymenoplasty](#virginitytesting)
11. [Forced marriage](#forcedmarriage)
12. [Radicalisation](#radicalisation)
13. [Pupils with family members in prison](#pupilswfamilyinprison)
14. [Pupils required to give evidence in court](#evidencecourt)
15. [Mental health](#mentalhealth)
16. [Serious violence](#seriousviolence)
17. [Adult involvement in youth-produced sexual imagery](#YPSI)

**Domestic abuse**

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

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

The school will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

**Homelessness**

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

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

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

Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSCS will be made as necessary where concerns are raised.

**Children absent from education**

A child who is absent from school can be a vital warning sign of a range of safeguarding issues, including neglect, CSE and CCE, particularly county lines. The school will ensure that the response to children persistently being absent from education supports identifying such abuse and helps prevent the risk of pupils becoming absent from education in the future. Staff will monitor pupils that are absent from the school, particularly on repeat occasions and/or prolonged periods, and report them to the DSL following normal safeguarding procedures, in accordance with the Children Missing from Education Policy. The school will inform the LA of any pupil who fails to attend regularly or has been absent without the school’s permission for a continuous period of 10 school days or more.

The school will follow the DfE’s [guidance](https://www.gov.uk/government/publications/working-together-to-improve-school-attendance) on improving attendance where there is a need to work with children’s services due to school absences indicating safeguarding concerns.

**Admissions register**

Pupils are placed on the admissions register at the beginning of the first day that is agreed by the school, or when the school has been notified that the pupil will first be attending. The school will notify the LA within 5 days of when a pupil’s name is added to the admissions register.

The school will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur. Two emergency contacts will be held for each pupil where possible. Staff will monitor pupils who do not attend the school on the agreed date and will notify the LA at the earliest opportunity.

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

* The full name of the parent with whom the pupil will live
* The new address
* The date from when the pupil will live at that address

If a parent notifies the school that their child will be attending a different school, or is already registered at a different school, the following information will be recorded on the admissions register:

* The name of the new school
* The date on which the pupil first attended, or is due to attend, that school

Where a pupil moves to a new school, the school will use a secure internet system to securely transfer pupils’ data.

To ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any pupil who is going to be deleted from the admission register, in accordance with the Education (Pupil Registration) (England) Regulations 2006 (as amended), where they:

* Have been taken out of the school by their parents, and are being educated outside the national education system, e.g. home education.
* Have ceased to attend the school, and no longer live within a reasonable distance of the premises.
* Have been certified by the school’s medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention to the pupil continuing to attend school after ceasing to be of compulsory school age.
* Have been in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of that period.
* Have been permanently excluded.

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

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

* The full name of the pupil
* The full name and address of any parent with whom the pupil lives
* At least one telephone number of the parent with whom the pupil lives
* The full name and address of the parent with whom the pupil is going to live, and the date that the pupil will start living there, if applicable
* The name of the pupil’s new school and the pupil’s expected start date there, if applicable
* The grounds for removal from the admissions register under regulation 8 of the Education (Pupil Registration) (England) Regulations 2006 (as amended)

The school will work with the LA to establish methods of making returns for pupils back into the school. The school will highlight to the LA where they have been unable to obtain necessary information from parents, e.g. where an address is unknown. The school will also highlight any other necessary contextual information, including safeguarding concerns.

**Child abduction and community safety incidents**

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

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

Pupils will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

**Child criminal exploitation (CCE)**

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

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

Specific forms of CCE can include:

* Being forced or manipulated into transporting drugs or money through county lines.
* Working in cannabis factories.
* Shoplifting or pickpocketing.
* Committing vehicle crime.
* Committing, or threatening to commit, serious violence to others.

The school will recognise that pupils involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. The school will also recognise that pupils of any gender are at risk of CCE.

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

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

**County lines**

For the purposes of this policy, **“county lines”** refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

As well as the general indicators for CCE, school staff will be aware of the specific indicators that a pupil may be involved in county lines, including:

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

Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a pupil may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

**Cyber-crime**

For the purposes of this policy, **“cyber-crime”** is defined as criminal activity committed using computers and/or the internet. This includes ‘cyber-enabled’ crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and ‘cyber-dependent’ crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

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

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

**Child sexual exploitation (CSE)**

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

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

The school will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the pupil’s immediate knowledge, e.g. through others sharing videos or images of them on social media. The school will recognise that CSE can affect any pupil who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16 and above who can legally consent to sexual activity. The school will also recognise that pupils may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

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

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

All concerns related to CSE will be managed in line with the school’s Child Sexual Exploitation (CSE) Policy.

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the LA. The LA and all other necessary authorities will then handle the matter to conclusion. The school will cooperate as needed.

**Modern slavery**

For the purposes of this policy, **“modern slavery”** encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

**FGM**

For the purposes of this policy, **“FGM”** is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

All staff will be alert to the possibility of a pupil being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSCS and/or the police. The school’s procedures relating to managing cases of FGM and protecting pupils will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate. **NB:** This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

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

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

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

Indicators that FGM may take place soon include:

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

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

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

FGM is included in the definition of so-called **“‘honour-based’ abuse (HBA)”**, which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

**Virginity testing and hymenoplasty**

Under the Health and Care Act 2022, it is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK. It is also illegal for UK nationals and residents to do these things outside the UK.

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

**Hymenoplasty** - A procedure which can involve a number of different techniques, but typically involving stitching or surgery, undertaken to reconstruct a hymen with the intent that the person bleeds the next time they have vaginal intercourse. Hymenoplasty is different to procedures that may be performed for clinical reasons, e.g. surgery to address discomfort or menstrual complications.

Virginity testing and hymenoplasty are forms of violence against women and girls and are part of the cycle of HBA, and can be precursors to child or forced marriage and other forms of family and/or community coercive behaviours, including physical and emotional control. Victims are pressurised into undergoing these procedures, often by family members or their intended husbands’ family to fulfil the requirement that a woman remains ‘pure’ before marriage. Those who ‘fail’ to meet this requirement are likely to suffer further abuse, including emotional and physical abuse, disownment and even honour killings.

The procedures are degrading and intrusive, and can result in extreme psychological trauma, provoking conditions such as anxiety, depression and PTSD, as well as physical harm and medical complications. Staff will be alert to the possible presence of stress, anxiety and other psychological or behavioural signs, and mental health support should be made available where appropriate.

Victims face barriers in coming forward, e.g. they may not know that the abuse was abnormal or wrong at the time, and may feel shameful, having been taught that speaking out against family and/or the community is wrong, or being scared about the repercussions of speaking out.  The school will educate pupils about the harms of these practices and dispel myths, e.g. the belief that virginity determines the worth of a woman, and establish an environment where pupils feel safe enough to make a disclosure.

Pupils aged 13 and older are considered to be most at risk, but it can affect those as young as 8, and anyone with female genitalia can be a victim regardless of age, gender identity, ethnicity, sexuality, religion, disability or socioeconomic status. All staff will be aware of the following indicators that a pupil is at risk of or has been subjected to a virginity test and/or hymenoplasty:

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

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

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

**Forced marriage**

Forced marriage is a crime. It is a form of abuse directed towards a child or vulnerable adult, including adults who are forced into marriage against their free will.

Forced marriage is a marriage where one or both spouses do not consent to the marriage but are coerced into it.Force can be physical, psychological, financial, sexual and emotional pressure. Forced marriage can be committed if a person lacks capacity, whether or not coercion plays a part.

Under the Anti-social Behaviour, Crime and Policing Act 2014 a person commits an offence if he or she uses violence, threats or any other form of coercion for the purpose of causing another person to enter into a marriage and believes, or ought reasonably to believe, that the conduct may cause the other person to enter into the marriage without free and full consent.

It is an offence to do anything intended to cause a child to marry before the child’s eighteenth birthday, whether or not the conduct amounts to violence, threats, or any other form of coercion or deception. This applies to non-binding, unofficial ‘marriages’ as well as legal marriages.

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

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

Staff who have any concerns regarding a pupil who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL or headteacher and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit. The DSL or headteacher will ensure the pupil is spoken to privately about these concerns and further action taken as appropriate. Pupils will always be listened to and have their comments taken seriously.

It will be made clear to staff members that they should not approach the pupil’s family or those with influence in the community, without the express consent of the pupil, as this will alert them to the concerns and may place the pupil in further danger.

Advice will be sought from the Forced Marriage Unit following any suspicion of forced marriage among pupils.

If a pupil is being forced to marry, or is fearful of being forced to, the school will be especially vigilant for signs of mental health disorders and self-harm. The pupil will be supported by the DSL and senior mental health lead and referrals will be made on a case-by-case basis.

Staff members will make themselves aware of how they can support victims of forced marriage in order to respond to the victims needs at an early stage, and be aware of the practical help they can offer, e.g. referral to social services and local and national support groups.

Local child safeguarding procedures will be activated following concerns regarding forced marriage – the school will use existing national and local protocols for multi-agency liaison with police and children’s social care.

The school will support any victims to seek help by:

* Making them aware of their rights and choices to seek legal advice and representation.
* Recording injuries and making referrals for medical examination where necessary.
* Providing personal safety advice.
* Developing a safety plan in case they are seen, e.g. by preparing another reason for why the victim is seeking help.

The school will establish where possible whether pupils at risk of forced marriage have a dual nationality or two passports.

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

The school will take a whole school approach towards educating on forced marriage in the school curriculum and environment – in particular, the school’s RSHE curriculum will incorporate teaching about the signs of forced marriage and how to obtain help. Appropriate materials and sources of further support will be signposted to pupils. Pupils will be encouraged to access appropriate advice, information and support.

Teachers and other staff members will be educated through CPD about the issues surrounding forced marriage and the signs to look out for.

**Missing pupils**

**Pupil missing from a school trip**

See Educational Visit Risk Assessment for information.

|  |
| --- |
| **Emergency procedures** |
| The visit leader will be familiar with these plans for any -   * Serious and unexpected risk * Serious and life-threatening injury * Individuals going missing * A serious breach of safeguarding expectations |
| **In the case of an emergency, trip leader or other supervising adult to contact the school office on 01274 639 049. If out of school hours contact Clare Pugh on 07884 284 225 or Claire Broomfield 07855 341 793.**  The school office will then contact parents/carers as required, and inform them of changes to plans or cancellations of trips and/or alternative travel plans. This will form part of a wider communication plan that covers how routine communications should be handled in such situations. |
| **Child goes missing**  If a pupil is lost or unaccounted for, the trip leader will contact all adults via mobile phone and agree to meet in a central meeting point. The trip leader will search the area while another member of staff remains in charge of other pupils. If there is a member of staff at the location of the visit, inform them immediately to help with the search. If the pupil cannot to located in the immediate vicinity, the trip leader will phone the Headteacher or member of the leadership team.  In the unlikely event that a pupil cannot be found within 15 minutes, the trip leader will contact the school office who will notify the parents/carers. The trip leader will then contact the police and provide them with the relevant information so they can take over the search, staying with them to comfort the pupil when found.  If appropriate the remaining staff and adults will return to the school with the rest of the pupils. |
| **Medical attention**  All incidents and accidents will be reported in line with our health and safety policy, including required reporting to Ofsted and the Health and Safety Executive (HSE).  Smaller incidents, accidents or near misses that do not require external reporting will still be covered by an internal report, to include steps that can be taken in the future to avoid similar incidents.  There will also be a clear process for evaluating all visits and trips once they have been concluded from the planning through to the visit itself. This will help with evaluating whether planning worked and to learn from any incidents that took place.  In the event of a pupil requiring hospital or emergency medical treatment, 1 member of staff will always accompany a pupil seeking medical treatment. |

**Missing pupil from school**

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

**As soon as you discover a child is missing from school:**

|  |
| --- |
| 1. Alert the Headteacher /Deputy Headteacher and Business Manager immediately stating last known location of the child.  All exits should be secured. The Business Manager should instruct staff to monitor school’s main reception and prevent any person from leaving the building as they may have information to help. |
| 2. The Headteacher should instigate a controlled search starting at the last known location. This should be carried out systematically and include all school buildings and grounds. |
| 3. If the child is not located the Headteacher or member of the Leadership Team should inform the Police immediately or delegate someone to dial 999 and provide relevant information. |
| 4. Unless otherwise directed by the Police the Headteacher or member of the Leadership Team should inform parents/guardians (by telephone) of current status. School’s Business Manager should prepare a room to support parents/ guardians should they arrive on-site. |
| 5. On arrival of the Police the Headteacher should ensure all known facts are given to officers. A request can be made for the Police to assist with further school and parent / guardian liaison. |
| 6. If the child is not located or known to have been abducted the Headteacher or member of the Leadership Team should alert the Local Authority Director of Education and school’s Chair of Governors (in their absence the Vice Chair should be notified). |
| 7. No press briefing should be made unless directed by the Police with the input from the Local Authority Media Relations Office. |
| 8. The Headteacher or member of the Leadership Team to hold a staff briefing when possible to advise of the current situation. Ensure staff are aware of information sharing protocols. |
| 9. Under the direction of the Head Teacher or member of the Leadership Team all staff should work with multi-agency partners to ensure parents, guardians and family members are supported whilst the matter is resolved. |
| Post Event: Headteacher or member of the Leadership Team to commence a critical incident log and accurately document all actions/relevant factual information. Ensure times and dates are recorded.  The Headteacher or member of the Leadership Team to arrange an emergency governing body meeting to review school’s critical incident paperwork and safeguarding arrangements. |

**Non-collection of pupils**

If a child is not collected at the end of the session/day:

* The class teacher will wait on the playground with the pupil until 3.10pm
* The pupil will be brought to the sofa by Reception and a member of the admin team will be notified
* The pupil’s name is written in the ‘Lates’ book
* The parents/carer will be telephoned to find out why their child has not been collected, and to ascertain when the child will be collected, and by whom
* If a parent cannot be contacted, other named emergency contacts given by the parent will be telephoned, in order to try to contact the parent. The calls should not be made where the child can hear
* The pupil will join after school club if the parent is running late or has not been collected
* If no contact has been made with the parent (or emergency contact) by 3.45pm, a member of the leadership team will carry out a home visit with another member of staff
* The child will go to extra club while staff continue to try to contact parents/carers or other emergency contacts
* If no contact can be made with any of the contact numbers or there is no one present at the home address, the DSL or DDSL will contact Bradford children’s social care on 01274 433999

**Radicalisation**

For the purposes of this policy, **“radicalisation”** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

For the purposes of this policy, **“extremism”** refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces.

For the purposes of this policy, **“terrorism”** refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public, and be made for the purpose of advancing a political, religious or ideological cause.

Protecting pupils from the risk of radicalisation is part of the school’s wider safeguarding duties. The school will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in pupils’ behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify pupils who may be susceptible to extremist ideologies and radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. The school will work with local safeguarding arrangements as appropriate.

The school will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the pupil’s parents, unless the school has reason to believe that the child would be placed at risk as a result.

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect pupils against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

**The Prevent duty**

Under section 26 of the Counter-Terrorism and Security Act 2015, all schools are subject to a duty to have “due regard to the need to prevent people from being drawn into terrorism”, known as **“the Prevent duty”**. The Prevent duty will form part of the school’s wider safeguarding obligations.

The school’s procedures for carrying out the Prevent duty, including how it will engage and implement the Channel programme, are outline in the Prevent Duty Policy.

**Pupils with family members in prison**

Pupils with a family member in prison will be offered pastoral support as necessary. They will receive a copy of ‘[Are you a young person with a family member in prison?](https://www.nicco.org.uk/directory-of-resources)’ from Action for Prisoners’ Families where appropriate and allowed the opportunity to discuss questions and concerns.

**Pupils required to give evidence in court**

Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Pupils will be provided with the booklet ‘[Going to Court](https://www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds)’ from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

**Mental health**

All staff will be made aware that mental health problems can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Staff will not attempt to make a diagnosis of mental health problems – the school will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify pupils whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how pupils’ experiences can impact on their mental health, behaviour, and education.

Staff who have a mental health concern about a pupil that is also a safeguarding concern will act in line with this policy and speak to the DSL or deputy DSLs.

The school will access a range of advice to help them identify pupils in need of additional mental health support, including working with external agencies.

In all cases of mental health difficulties, the school’s Social, Emotional and Mental Health (SEMH) Policy will be consulted and adhered to at all times.

**Serious violence**

Through training, all staff will be made aware of the indicators which may signal a pupil is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

* Increased absence from school.
* A change in friendships.
* Relationships with older individuals or groups.
* A significant decline in academic performance.
* Signs of self-harm.
* A significant change in wellbeing.
* Signs of assault.
* Unexplained injuries.
* Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a pupil’s vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

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

Staff members who suspect a pupil may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

The school will cooperate with core duty holders when asked and ensure arrangements are in place to do so.

**Adult involvement in youth-produced sexual imagery**

The school’s full response to youth-produced sexual imagery (YPSI) is outlined in the Youth-produced Sexual Imagery Policy.

**Sexually motivated incidents**

The school will remain aware that not all instances of YPSI will be between children and young people, and in some cases may involve adults posing as a child for the purpose of obtaining nude and semi-nude images from persons under 18.

Staff will be aware of the signs that an adult is involved in the sharing the nude or semi-nude images. These include:

* Being contacted by an online account they do not know but appears to be from somebody under the age of 18.
* Quickly being engaged in sexually explicit communications.
* The offender sharing unsolicited sexual images.
* The conversation being moved from a public to a private and/or encrypted platform.
* Being coerced or pressured into doing sexual things, including producing sexual imagery.
* Being offered money or gifts.
* Being threatened or blackmailed into sharing nude or semi-nude images, and/or further sexual activity.

**Financially motivated incidents**

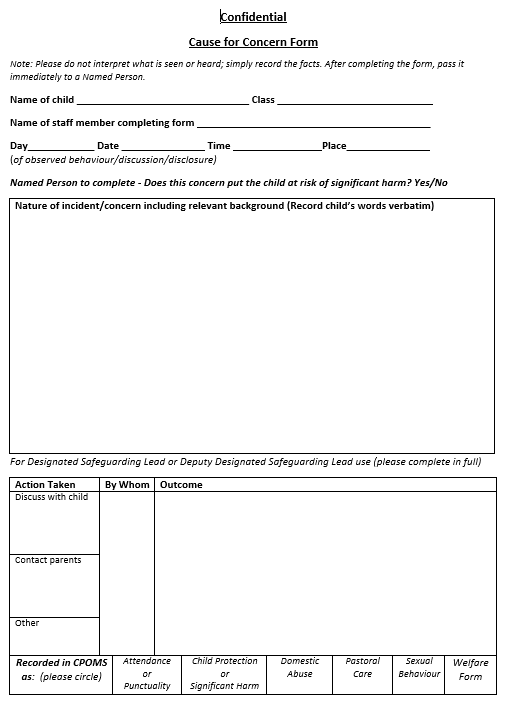
Financially motivated incidents of YPSI involving adults may also be called **“sextortion”**, where the offender threatens to release nudes or semi-nudes of a child or young person unless they do something to prevent it, e.g. paying money. In these cases, offenders often pose as children and:

* Groom or coerce the victim into sending nudes or semi-nudes in order to blackmail them.
* Use images that have been stolen from the child or young person, e.g. via hacking.
* Use digitally manipulated and/or AI-generated images of the child or young person.

Staff will be aware of the signs of sextortion, which include:

* Being contacted by an online account they do not know but appears to be from somebody under the age of 18.
* Quickly being engaged in sexually explicit communications.
* The offender sharing sexual images first.
* The conversation being moved from a public to a private and/or encrypted platform.
* Told their online accounts have been hacked in order to obtain images, personal information, and contacts.
* Being blackmailed into sending money or sharing bank account details.
* Being shown stolen or digitally manipulated/generated images of the victim.

**Appendix B**



**Appendix C**

**Child Protection Flow Chart**

