



Safeguarding and Child Protection Policy

Author:

Brian Duffy

Date:

1st September 2026



**Shaw
Education
Trust**

Opening doors
to the world



• through the
power of learning



CONTENTS

SECTION A: INTRODUCTION

1. About this policy
2. Legislation and Guidance
3. Roles and Responsibilities
4. Local Safeguarding Partners
5. Quality Assurance of Safeguarding in SET schools
6. Confidentiality and Information Sharing

SECTION B: FACTORS AFFECTING VULNERABILITY

7. Vulnerable Children
8. Adverse Childhood Experiences
9. Children and the Court System
10. Children Absent from Education
11. Children with Family Members in Prison
12. Gender Questioning Children & Social Transitioning
13. Homelessness

SECTION C: SAFEGUARDING CONCERNS AFFECTING CHILDREN

14. Abuse Categories (including Neglect and Exploitation)
15. Bullying
16. Child on Child Abuse including Sexual Violence and Sexual Harassment
17. Child Criminal Exploitation (inc. County Lines)
18. Child Sexual Exploitation
19. Domestic Abuse
20. Honour-based-Abuse (Breast Ironing, FGM & Forced Marriage)
21. Mental and Emotional Health
22. Modern Slavery & Trafficking
23. Online Issues





- 24. Radicalisation
- 25. Serious violence and knife crime, inc. violence against women and girls.
- 26. Upskirting

SECTION D: CHILD PROTECTION PROCEDURES

- 27. Child Protection and Child in Need
- 28. Child Safeguarding Practice Reviews (SPRs) (formerly known as Serious Case Reviews)
- 29. Dealing with a disclosure
- 30. Gender Questioning Children – Social Transitioning
- 31. Handling Allegations against staff
- 32. Handling Allegations of child-on-child abuse, inc. harassment & violence
- 33. Online Safety (e-safety) (including F&M & Remote Education)
- 34. Mental Health School Support
- 35. Prevent Duty & Channel
- 36. Reporting a Concern/Making a Referral
- 37. Record keeping
- 38. Safer Recruitment
- 39. Site Safety
- 40. Staff Training, Induction and Supervision
- 41. Teaching Safeguarding
- 42. Whistleblowing
- 43. Working with others inc. Early Help

SECTION E: ANNEXES

- A. School details and Personnel
- B. Local Safeguarding Partners
- C. Referral Procedures including good practice referral process
- D. Residential Information (relevant to some schools)



Opportunity

Integrity

Community

Equity





SECTION A: INTRODUCTION

This trust-wide policy has been updated to reflect the changes introduced in the latest version of *Keeping Children Safe in Education (KCSiE)* (2026). While some content is necessarily repeated, readers should note that both documents are key resources for Designated Safeguarding Leads (DSLs) and are intended to support the highest standards of safeguarding practice.

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

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

Shaw Education Trust (SET) has a responsibility to ensure appropriate safeguarding policies, procedures, protocols, and guidance are in place to comply with legislation and keep all children, pupils, and learners safe.

SET recognises that keeping pupils safe requires leaders to create an open and supportive culture where both pupils and staff feel able to speak freely and raise concerns.

Effective systems must be in place to ensure that pupils of all ages and abilities can communicate their views and concerns.

Within this policy, 'pupils' refers to learners of all ages across SET establishments, 'school' refers to all SET schools, schools, and colleges, 'headteacher' includes the Head of School, Executive Principal, and/or Principal, where applicable, and 'parents' covers all primary caregivers of pupils.

The policy emphasises SET's commitment to safeguarding through legal compliance, an open reporting culture, and ensuring all learners can have their voices heard.



In accordance with the guidance, governance requires that:



- the policy is publicly available via the school website or by other means,
- provided to all staff (including temporary staff) at induction along with a staff code of conduct.
- Part One is read by all staff,
- All employees and governors sign an annual declaration form to confirm they understand their responsibilities,

The overall responsibility for the approval of this Policy sits with the Trust Board. However, the day-to-day operational management and implementation of the Policy is the responsibility of the Headteacher and the local governance structures.

All schools must follow the Trust safeguarding policy. Schools may have additional local arrangements, which should be detailed in the policy annex.

Whilst this policy sets out the actions taken by our staff across SET in safeguarding and protecting children in school, safeguarding concerns are more likely to arise outside school and outside the family environment (extra-familial). Staff, particularly the Designated Safeguarding Lead (DSL) and deputies, must consider risks of abuse or exploitation occurring in wider community contexts.

All staff are in a position of trust and must maintain the highest professional standards. Any inappropriate behaviour towards children is unacceptable. In addition, staff understand that, under the Sexual Offences Act, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual.

1. About this policy

This policy sets out the systems, processes, and arrangements used to create and maintain a safe learning environment for all pupils and identifies areas of safeguarding concern and explains how schools should manage and reduce risks to children.

Safeguarding refers to the policies, practices, and preventative measures used by schools to keep all children safe. Child Protection refers to actions taken to protect specific children who are suffering, or are at risk of suffering, significant harm.

We recognise that all children may be vulnerable at times. Safeguarding and promoting pupil welfare extends beyond basic child protection procedures. It is embedded within all activities and functions across Shaw Education Trust (SET).





This policy works alongside and supports other Trust-wide safeguarding policies and individual school safeguarding policies and has undergone an Equality Impact Assessment. It is considered compliant with the Equality Act and is not believed to have adverse effects relating to race, gender, or disability.

2. Legislation and Guidance

The policy has been developed in line with key legislation, including the Children Act and the Education Act. The policy is reviewed each year and updated for each academic year following the publication of the latest Keeping Children Safe in Education (KCSiE) statutory guidance.

All schools and colleges must have regard to the current version of KCSiE when carrying out their safeguarding and child welfare responsibilities.

KCSiE refers to the school's 'proprietor', which in this context is Shaw Education Trust (SET). Schools should also refer to: Working Together to Safeguard Children and the Department for Education (DfE) for guidance on safeguarding children.

3. Roles and Responsibilities

KCSiE outlines responsibilities of staff to safeguard pupils. In this section, this is broken down into further detail for each group/individual within our Trust. Trust and School colleagues should refer to the Trust's Scheme of Delegation for specific details.

The Chair of Trustees will ensure that:

- A trustee is nominated as the lead trustee with responsibility for safeguarding including being trained appropriately
- The trust wide safeguarding report is considered at relevant full board or trustees meeting
- New trustees receive safeguarding training as part of their induction and all trustees carry out safeguarding training each year.

SET Central Team will ensure that:

- The policies and procedures to safeguard and promote the welfare of pupils are fully implemented.
- Safer Recruitment procedures are correctly applied including the maintenance of single central records (SCR).





- Safeguarding training is available and completed across the Trust, appropriate to each role.
- The trust wide safeguarding and pupil protection policy is compliant with statutory duties.

Local Governance responsibilities include that:

- A member of the local governing board (School Council) is nominated as the link councillor with responsibility for safeguarding.
- A senior leader in school has DSL responsibility and undergoes relevant training, along with other staff and adults, periodically and on induction.
- The school operates safe recruitment and selection practices as outlined in SET policies and KCSiE Part Three.
- That staff adhere to the staff code of conduct policy along with other relevant policies.
- The school follow procedures for allegations against staff in line with KCSiE Part Four and Trust policies and procedures.
- Chair of AC is available to liaise with the local authority on and significant safeguarding issue, including in the event of an allegation made against the Headteacher (Local Authority Designated Officer - LADO).
- Appropriate filters and monitoring systems are in place in school to protect pupils from online harm.
- A trained designated teacher for looked after children is in place.

Headteacher will ensure that:

- The policies and procedures adopted are fully implemented and followed by all staff, including supply staff and volunteers
- Safer Recruitment systems are robust and of high quality.
- A DSL and DDSLs are identified to whole school. These staff will be properly trained.
- All staff and volunteers receive appropriate training and safeguarding information as required, including how to report on other adults.
- Parents/pupils are aware of safeguarding procedures and how to raise a concern.
- Processes are in place to identify children who may benefit from early help and ensure that all staff are aware of the processes.

The Designated Safeguarding Lead:

The DSL (member of school leadership team) has a specific responsibility for safeguarding and promoting the welfare of all pupils registered in the school. A full role description is outlined in KCSiE Annex C.





School staff:

School staff know that they have an important role as many safeguarding issues become known to them before a DSL may get involved, e.g. disclosures from pupils. Expectations are outlined in KCSiE Part One, which all staff must read and submit each year a signed declaration they have done so.

4. Local Safeguarding Partners

Local safeguarding arrangements, as outlined in DfE Local Safeguarding transitional arrangements, are led by three safeguarding partners (local authorities, chief officers of police, and clinical commissioning groups). Safeguarding partners will agree the arrangements for themselves, and any relevant agencies they consider appropriate, e.g. schools, to work together to safeguard and promote the welfare of children in their area. Each local authority may have slightly different arrangements and full details of the school's local arrangements are outlined in Annex B of this document.

5. Quality Assurance of Safeguarding in SET schools

Internal monitoring and evaluation by senior staff, e.g. DSLs, Headteachers and governance is a key aspect of quality assurance in school, and in addition, SET also have central team colleagues who support this process. There are three stages to this aspect of the quality assurance process:

- SET Safeguarding Audit – completed annually by DSL, and also updated throughout the year when relevant.
- SET Safeguarding Documentation – schools have relevant documentary evidence of safeguarding practice and procedures.
- SET Monitoring Visits and 'Keeping in Touch' online meetings – central team members visit schools to carry out activities to assess the quality of safeguarding processes.

6. Confidentiality and Information Sharing

When managing sensitive information, leaders, ensure confidentiality protocols are followed and that information is shared appropriately and in line with GDPR and data protection requirements. Staff receive information only on a need-to-know basis.



All Staff, Supply Staff and Volunteers understand their professional duty to share information



when it is necessary to safeguard children and are aware that safeguarding concerns must not be kept confidential if a child is at risk.

Data protection laws are not barriers to safeguarding – GDPR and the Data Protection Act support appropriate information sharing. School will be open and honest with children and families where appropriate, unless doing so would increase risk.

When sharing information school determines if it is, necessary, proportionate, relevant, accurate, timely and secure

Records are retained in line with data statutory requirements.





SECTION B: FACTORS AFFECTING VULNERABILITY

This section outlines some the key factors which may make a child more vulnerable to a safeguarding risk.

7. Vulnerable Children

There are some children who are more at risk than others and there are further procedures to support these groupsof children. Any child deemed more at risk than ‘most’ children, is often defined as ‘vulnerable’. ‘Vulnerable’ children can be those, but not exclusively, listed below:

- **Children with a social worker:** Includes those on child in need plans, child protection plans, or looked-after children (LAC).
- **Children with Special Educational Needs and Disabilities (SEND):** Includes those with an Education, Health and Care (EHC) plan.
- **Children who are otherwise vulnerable:** Determined at local authority or education provider discretion, including young carers, children in temporary housing, or those at risk of becoming NEET.

In addition, many ‘groups’ may also be considered as potentiallybeing in the vulnerable cohort, e.g. children who have medical conditions, children of Gypsy, Roma & Traveller (GRT) families, children with English as an additional language, children with mental health issues, children absent from education, children in pupil referral units, LGBTQ+ children, children from ethnic minority backgrounds, children in families that may have challenging home circumstances, e.g. poverty, poor housing, domestic abuse etc., children questioning their gender (see sections 20 & 32), and children who have experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.

It is important to recognise that all children can be at risk at some level,and that many children in the groups above will never experience any issues.

8. Adverse Childhood Experiences





Adverse Childhood Experiences (ACEs: Public Health England and ACEs: Wave Trust) are stressful or traumatic experiences that can have a huge impact on children and young people throughout their lives. The ten widely recognised ACEs below.

As well as these 10 ACEs there are a range of other types of childhood adversity that can have similar negative long-term effects. These include bereavement, bullying, poverty and community adversities such as living in a deprived area, neighbourhood violence etc. The more adversity a child experiences the more likely it is to impact upon their mental and physical health.

Abuse:	Neglect:	Growing up in a household where:
Physical	Emotional	- there are adults with substance use problems - there are adults with mental health problems
Sexual	Physical	- there is domestic violence - there are adults who have spent time in prison
Verbal		parents have separated

9. Children and the Court System

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. When pupils are required to give evidence in court, SET schools should use the available guides signposted in KCSiE Annex B to support pupils.

10. Children Absent from Education

Unexplainable and/or persistent absences from education can be an indicator of abuse, neglect and radicalisation, and may raise concerns around child sexual exploitation. All staff need to be aware of the signs to look out for and potential safeguarding concerns 'such as travelling to conflict zones, female genital mutilation and forced marriage'. Attendance is monitored daily and vulnerable pupils prioritised when following up absences.

Pupils who are deleted from the school register for any permissible reason are also reported to the Local Authority immediately upon deletion of the record in accordance with DfE Children Missing Education.

11. Children with Family Members in Prison

Children with family members in prison are at risk of poor outcomes including poverty, stigma,





isolation and poor mental health. This is recognised as one of the ten Adverse Childhood Experiences. Support to assist schools and families can be sought from the National information centre on children of offenders.

12. Gender Questioning Children & Social Transitioning **(see section 30)**

In recent years, we have seen a significant increase in the number of children who are questioning the way they feel about being a boy or a girl, including the physical attributes of their sex and the related ways in which they fit into society.

Safeguarding risks for children questioning their gender include peer bullying, harassment, and an elevated risk of mental health struggles like self-harm or suicidal ideation. Additional vulnerabilities arise from complex family dynamics, unsupportive environments, and potential exposure to predatory behaviour online. Gender distress can be for some pupils interconnected with neurodivergence (like autism) or prior trauma. The stress of questioning their identity can lead to heightened vulnerability for some pupils.

While involving parents is generally best practice, it can pose a direct safeguarding risk if a family's discriminatory behaviour or abuse is a threat to the child's safety and well-being. Pupils can often struggle at school with single-sex facilities, and this can cause anxiety.

Social transitioning for children is a non-medical process where a child changes their outward expression and social role to align with their gender identity. This can include altering their name, using different pronouns, and changing their clothing, hairstyle, or grooming habits to match how they identify.

13. Homelessness

Being homeless or at risk of being homeless presents a real risk to a child's welfare. Indicators that a family may be at risk of homelessness may include, household debt, rent arrears, domestic abuse and anti-social behaviour.

Pupils who are at risk of or who's family have become homeless will be supported through normal safeguarding referral procedures in conjunction with children's services. Where deemed appropriate the school will facilitate support through the Local Housing Authority in order to support a family who find themselves in this situation. Further national guidance will be followed if a student who is 16 or 17 becomes homeless. Again, our schools will support these students through early help intervention.





SECTION C: SAFEGUARDING CONCERNS AFFECTING CHILDREN

This section outlines some the key safeguarding concerns which children may experience due to either their own unsafe behaviour or the behaviour of others.

14. Abuse Categories (including Neglect and Exploitation)

There are four recognised types of abuse:

1. **Physical Abuse** (NSPCC): is any way of intentionally causing physical harm to a child or young person.

Signs of physical abuse can include (not an exhaustive list):

- bruises (especially on certain areas and/or in clusters)
- broken or fractured bones
- burns or scalds (with clear shapes and/or on certain parts of body)
- effects of poisoning such as vomiting, drowsiness or seizures

2. **Emotional Abuse** (NSPCC): is any type of abuse that involves the continual emotional mistreatment of a child. It's sometimes called psychological abuse.

Signs of emotional abuse can include (not an exhaustive list):

- act in a way that's inappropriate for their age
- difficulty making or maintaining relationships
- seems unconfident or lack of self-assurance
- struggle to control emotion

3. **Sexual Abuse** (NSPCC): when a child or young person is sexually abused, they're forced or tricked into sexual activities. They might not understand that what's happening is abuse or that it's wrong.

Signs of sexual abuse can include (not an exhaustive list):

- avoiding being alone with or frightened of people/person
- bleeding, discharge, pains or soreness in genital or anal area
- knowledge and/or use of sexual language or behaviour that wouldn't be expected of their age
- having nightmares or bed-wetting
- self-harm





4. **Neglect** (NSPCC): is the ongoing failure to meet a child's basic needs and the most common form of child abuse. A child might be left hungry or dirty, or without proper clothing, shelter, supervision, or health care.

Signs of neglect can include (not an exhaustive list):

- being smelly or dirty, having unwashed clothes or the wrong clothing, such as no warm clothes in winter
- being hungry or not given money for food
- health and development issues such as: poor muscle tone or prominent joints / dental issues / poor language or social skills / regular illness, infections and/or accidental injuries / weight or growth issues
- housing and family issues such as living in an unsuitable home environment, such as having no heating / being left alone for a long time / taking on the role of carer for other family members

It should be noted that these forms of abuse can also occur child-on-child.

There can be some general 'non-specific' signs of abuse that can appear in any of the types of abuse, e.g. attention-seeking behaviour, anxiety/depression, lack of self-esteem, lack of social skills and may have few friends, self-harm, and withdrawal from activities and/or others.

Staff should be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household.

Exploitation as form of abuse

All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple types of exploitation, including (but not limited to) sexual exploitation (online exploitation, trafficking, prostitution and pornography), criminal & financial exploitation (county lines, 'money muling', forced theft & begging, modern slavery), forced marriage and radicalisation.

Indicators of concern

There can be displayed by parents/others who may be aware of the abuse a child is suffering and do not disclose it to professionals, possibly due to one or more factors such as; being the perpetrators themselves, in fear of someone else, simply unaware due to mental or learning issues (e.g. neglect), etc.

Parents may:

- offer an explanation inconsistent with an injury/child's behaviour





- offer several different explanations provided for an injury/behaviour
- be unable to explain a reason for any delay in seeking treatment
- be uninterested/undisturbed by an injury/change in behaviour
- be absent without good reason when child is presented for treatment
- move their children around schools frequently
- be reluctant to give information or mention previous injuries/episodes
- use different doctors

15. Bullying

All schools will have anti-bullying procedures (usually contained either in Anti-Bullying Policy or Behaviour Policy). The impact of bullying is not just the physical and emotional of the actual bullying itself but can place the pupil in a position where they become vulnerable to another form of abuse. They may seek out comfort and acceptance elsewhere which may make them susceptible to advances from other individuals who may cause abuse, which may include online or in person grooming, indoctrination into radicalisation, and/or persuasion into criminal activity, e.g. county lines.

Staff should be aware of the impact of bullying in some of these aspects. Whilst there is no one definition of 'bullying', our trust has introduced two acronyms which give a more structured definition, as follows, which schools can choose from:

TIIP: negative behaviour(s) which is **T**argeted, **I**ntended to harm, creates an **I**mbalance of power, and is **P**ersistent.

STOP IT: negative behaviour(s) which occurs **S**everal **T**imes **O**n **P**urpose, which creates an Imbalance of power and is **T**argeted.

16. Child on Child Abuse, including Sexual Violence and Sexual Harassment (see Section 32)

Children can abuse other children. This can take many forms, including (but is not limited to): **physical abuse** such as bullying, hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; **emotional abuse** such as within intimate partner relationships; intra familial





harms, (cyber)bullying; **sexual abuse** such as sexual violence and sexual harassment (see below); sharing nude and semi-nude images and initiation/hazing type violence and rituals. Other discriminatory behaviours can also harm in a variety of ways, e.g. racism, misogyny, homophobia etc. More details can be found in Part Five of KCSiE.

Some sexual behaviour is a normal part of child **development** and learning about relationships. Children mature at different rates, making it sometimes difficult to distinguish between expected and concerning behaviour.

Tools such as Hackett's Continuum help assess behaviour.

Harmful Sexual Behaviour is an umbrella term on a continuum. Behaviours may escalate into sexual harassment or sexual violence. It can occur online or face-to-face (both physically and verbally) and is never acceptable.

Sexual Harassment and Sexual Violence, can occur between children of any age or gender, both online and offline. It can involve individuals or groups and victims may experience significant

STAGE	EXAMPLES
Developmentally typical	E.g. Behaviour is developmentally expected and socially acceptable. It is consensual, mutual and reciprocal and involves shared decision making.
Problematic	E.g. Behaviour that is socially acceptable within a peer group but would be considered inappropriate outside that group. May involve an inappropriate context for behaviour that would otherwise be considered normal
Harmful Sexual Behaviours	inc. Sexual Harassment and Sexual Violence (see below)

emotional distress and negative impacts on education. Girls are more likely to be victims, boys more likely to be perpetrators, and pupils with SEND are at increased risk.

Sexual violence and sexual harassment are never acceptable and must not be dismissed as; "Banter"/"Part of growing up"/"Just having a laugh"/"Boys being boys". Behaviours such as unwanted sexual touching, lifting skirts, flicking bras, or grabbing body parts must always be challenged.

Examples of Sexual Harassment:

- Sexual comments, remarks, or name-calling.
- Sexual jokes or taunting.





- Unwanted physical contact.
- Displaying sexual images or content.
- Online sexual harassment, including:
 - Sharing explicit content
 - Sharing nude or semi-nude images.
 - Upskirting.
 - Sexualised online bullying.
 - Unwanted sexual messages.
 - Sexual coercion, exploitation, or threats.

Examples of Sexual Violence:

- Rape
- Assault by penetration
- Sexual assault (including non-consensual touching or kissing)
- Causing someone to engage in sexual activity without consent

Sexual violence and sexual harassment are never acceptable.

The procedures for investigating and dealing with child-on-child abuse must be made clear to all staff through safeguarding training and the school's reporting procedures in line with KCSiE.

Misogyny: a form of prejudice, hatred, or contempt directed against women and girls. "Banter", "Part of growing up", "Just having a laugh", "Boys being boys", are at times reasons offered to explain misogynistic behaviours. Whilst school staff must appreciate the positive relationships pupils create and develop with each other that may be based partly in acceptable 'context-relevant' behaviours, they must never accept behaviours which in any way degrade female pupils or staff, or indeed any person. Behaviours such as unwanted sexual touching, lifting skirts, flicking bras, or grabbing body parts could be deemed as sexual harassment and/or sexual violence and must always be appropriately challenged, taking into consideration the age and cognitive ability of the pupil displaying these behaviours.



Misandry: the hatred, dislike, or prejudice against men. It is the conceptual counterpart to



misogyny (the hatred of women). Whilst misogyny is more common-place, schools staff must challenge all discriminatory behaviour regardless of sex.

Consent can be defined as 'permission for something to happen or agreement to do something'. For sex, this should be freely given consent. The law in the UK states that no one under the age of 13 is able to give consent for sexual activity and the legal age of consent is 16.

All concerns must be taken seriously, reported promptly, and managed in line with safeguarding procedures to protect all children involved. It can be withdrawn at any time, and different sexual activities require separate consent. Sexual activity without consent is a criminal offence.

All child-on-child abuse incidents must be taken seriously and appropriate support provided.

17. Child Criminal Exploitation (including County Lines)

CCE is a form of abuse and occurs when an individual or group manipulates, coerces, or controls a person under 18 into committing a crime, both in person and/or online. The victim may have been criminally exploited even if the activity appears consensual. It can lead to a child becoming part of a criminal or dangerous gang (NSPCC guidance) and/or include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines - see below), forced to shoplift or pickpocket, or to threaten other young people.

County Lines is the police term for urban gangs exploiting young people into moving drugs from a hub, normally a large city, into other markets - suburban areas and market and coastal towns - using dedicated mobile phone lines or "deal lines". This can involve children being trafficked away from their home area, staying in accommodation and selling and manufacturing drugs. Children are also increasingly being targeted and recruited online using social media.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions
- children who associate with other young people involved in exploitation
- children who suffer from changes in emotional well-being
- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late
- children who regularly miss school or education or do not take part in education

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





18. Child Sexual Exploitation

Child sexual exploitation (CSE) is defined as a form of child sexual abuse. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

CSE has links to other types of crime, but is not exclusive to:

- Child trafficking
- Domestic abuse
- Sexual violence in intimate relationships
- Grooming (including online grooming)
- Abusive images of children and their distribution
- Drugs-related offences
- Gang-related activity
- Immigration-related offences
- Domestic servitude

The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation:

- Acquisition of money and/or material goods etc. without plausible explanation
- Excessive receipt of texts/phone calls
- Inappropriate sexualised behaviour for age/sexually transmitted infection
- Relationships with controlling or significantly older individuals or groups
- Multiple callers (unknown adults or peers)
- Frequenting areas known for sex work
- Concerning use of internet or other social media

19. Domestic Abuse

“Behaviour of a person towards another person is “domestic abuse” if, (a) both are aged 16 or over and are “personally connected” to each other, and, (b) the behaviour is abusive.

Behaviour is “abusive” if it consists of any of the following; physical or sexual abuse / violent or threatening behaviour / controlling or coercive behaviour / economic abuse / psychological, emotional or other abuse, and it does not matter whether the behaviour consists of a single incident or a course of conduct.”





Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their well-being.

Any child or young person thought to be at immediate risk will be reported without delay to the local social care Emergency Duty Team.

Advice and support can be sought at; DfE Domestic abuse: how to get help, National abuse helpline, and from the NSPCC.

20. Honour-based-abuse (Breast Ironing, FGM & Forced Marriage)

So-called 'honour-based' abuse encompasses incidents or crimes which have usually been committed to protect or defend the honour of the family or community. This may include female genital mutilation, forced marriage, and practices such as breast ironing. All forms of so-called 'honour-based' violence are abuse.

The school is sensitive to differing family patterns and lifestyles that vary across different racial, ethnic and cultural groups but must ensure that the safety of the child is always paramount. These types of abuse can be more difficult to detect and don't always show the more 'typical signs' of abuse. These may well be carried out by loved ones who very much believe that culturally they are doing the right thing. However, child abuse cannot be condoned for religious or cultural reasons.

Breast ironing is the process of burning, massaging, pounding, or otherwise flattening young girls' breasts over a period of time with the aim of making them disappear or even stop developing. This is usually carried out by older female relatives including mothers with the purpose of making young girls look less like girls and preventing 'male attention'.

Signs may or may not be similar to other symptoms of abuse. In a school setting the child may refuse to take part in P.E lessons, be absent from school for a period of time, be reluctant to participate in any 'normal' medical programmes and possibly exhibit signs of discomfort or pain.

Female Genital Mutilation (FGM) is the total or partial removal of external female genitalia for non-medical reasons. It can occur at any age from between babyhood to early adulthood but is more commonly performed between the ages of 7 to 10 years old.

It is carried out for a number of reasons including cultural, psychosexual, aesthetic & hygienic, socio-economic, religious (although no religious sanction this act).

There are four types of procedure:

- Type 1 Clitoridectomy – partial/total removal of clitoris
- Type 2 Excision – partial/total removal of clitoris and labia minora
- Type 3 Infibulation – entrance to vagina is narrowed by inner/outer labia





- Type 4 all other procedures - that may include: pricking, piercing, incising, cauterising and scraping the genital area

FGM is internationally recognised as a violation of human rights of girls and women. It is illegal in most countries including the UK. The Serious Crime Act came into force in July 2015 and with it new legal powers to deal with FGM. Indicators which staff should be vigilant to include;

- Child talking about getting ready for a special ceremony or about going abroad to be 'cut' or to prepare for marriage
- Prolonged absence from school and/or family taking a long trip abroad
- Family being from one of the 'at risk' communities for FGM
- Knowledge that the child's sibling has undergone FGM

Signs that may indicate a child may have undergone FGM:

- Behaviour changes on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder, menstrual problems, and/or repeated urinary tract infection
- Difficulty sitting still and looking uncomfortable, including complaining about pain between the legs
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity

From 1st October 2015 there is a mandatory reporting duty placed on schools where they discover that FGM has been carried out on a girl under 18. It is important to note that staff will become aware of FGM by disclosure, not through physical examination.

A **forced marriage** is one entered into without the full and free consent of one or both parties and is a crime. It usually occurs when violence, threats or any other form of coercion is used to cause a person to enter into a marriage and is an entirely separate issue from arranged marriage. It is a human rights abuse and falls within the Crown Prosecution Service definition of domestic violence. It is a crime.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion is not used.

Factors that can increase the risk of a young girl experiencing a forced marriage can include:

- bereavement in the family, especially of the father
- older siblings refusing to marry thus pressuring the family to marry one of their children
- a disclosure of sexual abuse within the family
- a child disclosing to be LGBT (FGM can be viewed as a 'cure' by the family)





Signs for schools to be aware of which may indicate the possibility of a forced marriage include:

- self-harm or suicidal acts or comments
- running away from home
- a history of police intervention with the family
- FGM
- anxious behaviour about an upcoming holiday
- being watched by siblings or older cousins
- a sudden announcement of an engagement

21. Mental & Emotional Health (see Section 34)

More and more school children are struggling to cope with their mental health with rising rates of depression, anxiety and self-harm in children and young people. Mental health and mental illness are part of a 'spectrum', just as physical health and illness are.

All staff should also be aware that emotional and mental health problems can, in some cases, lead to a serious safeguarding issue and may be an indication that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

The most common mental health problems experienced by children include:

- anxiety
- self-harm
- depression
- eating disorders
- post-traumatic stress disorder
- ADHD
- mental health problems caused by developmental disabilities such as autism



Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and



into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education. DfE Advice and guidance are available for schools and families.

22. Modern Slavery & Trafficking

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Further reading is recommended for staff concerned that this may be occurring Safeguarding children who may have been trafficked.

23. Online Issues (see section 33)

Being online is an integral part of children and young people's lives. Social media, online games, websites and apps can be accessed through mobile phones, computers, laptops and tablets – all of which form a part of the lives of our pupils.

The internet and online technology, including the continued rise and use of artificial intelligence technology, provide exciting opportunities for pupil learning and growth, but it can also expose them to many forms of risk. The use of technology has become a significant component of many safeguarding issues, such as child sexual exploitation, radicalisation, sexual predation, 'cyber'-bullying.

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

- **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories,
- **contact:** being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes,
- **conduct:** online behaviour that increases the likelihood of, or causes harm; for example, making, sending and receiving explicit images, including those generated using AI and online bullying,





- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group

There are many 'dangers' online but two of the main ones which effect children are grooming, and sharing "nudes and semi-nudes" which includes self-generated, digitally altered and entirely AI-generated images, including so-called "deepfake" or "deep nude" content.

Sharing "nudes and semi-nudes" is sending, receiving, or forwarding sexually explicit messages, photographs, or images, primarily between digital devices (usually mobile phones), of oneself to others. It is accepted that young people experiment and challenge boundaries and therefore the risks associated with 'online' activity can never be eliminated.

A child is likely to be very distressed especially if the image has been circulated widely and if they don't know who has shared it, seen it or where it has ended up. They will need pastoral support during the disclosure and after the event. They may even need immediate protection or a referral to police or social services; parents should be informed as soon as possible (police advice permitting).

Artificial Intelligence, whilst bringing with it vast opportunities for educational development, also can create significant safeguarding issues:

- AI-Generated Child Sexual Abuse Material (AI-CSAM) e.g. fake images and videos of children, often bypassing detection systems.
- Emotional Manipulation and Parasocial Relationships, e.g. children often struggle to distinguish between genuine human interaction and the simulated empathy of AI chatbots and children may form deep romantic or friendship attachments with constantly available, emotionally responsive AI, which can impact their mental health and expectations of real-world relationships
- Online Harassment, Bullying, and Grooming, e.g. AI makes it incredibly easy and cheap for bullies to create fake audio messages, compromising images, or fabricated videos to target peers. Predatory actors can use AI algorithms and chatbots to establish fake identities.
- Privacy and Data Security, e.g. children often do not understand how AI tools process and store information. Openly sharing photos of children on social media platforms allows bad actors to harvest them to train generative models or create abusive content.
- Misinformation and Radicalisation, e.g. AI can be weaponised to generate or spread extremist content designed to radicalise young people through manipulative messaging.





- Lack of Enforceable Protections, e.g. many platforms lack robust, age-appropriate design standards or effective age verification, granting children unsupervised access to adult-oriented AI models.
- Common signs that a child may be experiencing online abuse/grooming may include:
- spending a lot more or a lot less time than usual online, texting, gaming or using social media
- seeming distant, upset or angry after using the internet or texting
- being secretive about who they're talking to and what they're doing online or on their mobile phone
- having lots of new phone numbers, texts or email addresses on their mobile phone, laptop or tablet

24. Radicalisation (see Section 35)

Children may be susceptible to radicalisation into terrorism.

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

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

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

Possible signs that a child may be being radicalised include:

- displaying feelings of isolation and an 'us and them' mentality
- being more argumentative and condemns others
- questioning their faith or identity
- downloading extremist material

Section 35 of this document outlines the actions taken to safeguard against radicalisation.



25. Serious violence and knife crime, including violence against women and girls.



Serious Youth Violence is defined as 'any offence of most serious violence or weapon-enabled crime, where the victim is aged 1-19' e.g. murder, manslaughter, rape, wounding with intent and causing grievous bodily harm.

Serious violence can occur for a variety of reasons including some of the categories listed in this policy, e.g. child criminal exploitation, county lines, and some consequences of radicalisation. It can mainly, although not totally, be involved with 'gang culture' where children, mainly boys, become involved in a gang for any number of reasons. It can be as an effect of gaining a sense of belonging, often associated with a lack of care within the home. It may be that they have been 'groomed' to become involved in illegal activities such as drugs, robberies etc. including county lines.

Gangs are defined as mainly comprising men and boys aged 13-25 years old, who take part in many forms of criminal activity (e.g. knife crime or robbery) who can engage in violence against other gangs, and who have identifiable markers, for example a territory, a name, or sometimes clothing.

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include:

- a change in friendship or relationships with older individuals or groups
- signs of assault or unexplained injuries
- in possession of unexplained gifts (sign of grooming into a gang)

Knife crime is a term used commonly in the media to refer, primarily, to street-based knife assaults and knife-carrying. However, there are many different criminal offences relating to knives. For example:

- it is an offence to threaten or cause harm to a person with a bladed weapon
- some bladed weapons are prohibited from being sold or purchased, including to anyone under the age of 18
- offences such as robbery or assault can be aggravated if a knife is involved
- it is also an offence to carry a knife in a public place without good reason

In April 2018 the government published its Serious Violence Strategy in response to increases in knife crime, gun crime and homicide across England. Action in the strategy is focused on 4 main themes:

- tackling county lines and misuse of drugs
- early intervention and prevention
- supporting communities and local partnerships
- law enforcement and the criminal justice response



The strategy has a call to action to partners, including education, from across different sectors



to come together in a multi-agency public health approach to tackling and preventing serious violence at a local level.

The UK Government classifies Violence Against Women and Girls (VAWG) as a national emergency. There is profound concern over harmful misogynistic influences impacting boys and young men, alongside rising rates of harmful sexual behaviour and relationship abuse reported among teenagers. VAWG crimes make up nearly 20% of all recorded crime in England and Wales.

The government defines the umbrella of concerns to include domestic abuse, stalking, rape, 'honour'-based abuse (including forced marriage and FGM), and sexual exploitation, all of which may have begun online, or are continued in some form or another. The government launched its strategy in December 2025 to combat this issue and work through, in part, early intervention and education, to reduce these incidents.

26. Upskirting

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





SECTION D: CHILD PROTECTION PROCEDURES

This section outlines some of the actions that schools, and safeguarding partners take to safeguard children who may need support following one or more issues outlined in Section C of this document. Of course, any child can experience harm, not just those most vulnerable.

27. Child Protection and Child in Need

Child in Need: Under Section 17 of the Children Act 1989, a child is defined as "in need" if they need local authority support to achieve or maintain a reasonable standard of health or development. In vulnerable circumstances, this may mean, young carers, disabled children, or those affected by parental illness, imprisonment, or complex family stress.

Child Protection: Under Section 47 of the Children Act 1989, a child protection plan is triggered when a child is suffering, or is likely to suffer, significant harm, from physical, emotional, sexual abuse or neglect.

School staff are likely to be asked to attend relevant meetings and report about an individual pupil. The child protection conference and is the responsibility of a local authority. The school may well assist in the formation of the plan and of course its implementation. It sets out how a child can be kept safe and what support they will need. Children on a CP will need a social worker.

28. Child Safeguarding Practice Reviews (SPRs) (formerly Serious Case Reviews)

Child Safeguarding Practice Reviews (SPRs), formerly known as Serious Case Reviews, are formal multi-agency investigations commissioned when a child dies or suffers serious harm due to abuse or neglect. Managed nationally by the Child Safeguarding Practice Review Panel, their core purpose is to identify systemic lessons, improve inter-agency working, and prevent future harm. SCRs could additionally be carried out where a child had not died but had come to serious harm as a result of abuse or neglect.

Reflecting on practice is key in safeguarding and our Trust has a process to allow a review of any case, no matter how minor to improve practice where relevant.

29. Dealing with a disclosure

Some children may not feel ready or know how to tell someone or a concern and/or they may not even recognise their experiences as harmful, due to their vulnerability, disability and/or sexual orientation or language barriers. This will not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. Staff will determine how best to build a trusting relationship with children to help communication.





Staff realise that when a child discloses that they are in a very privileged and important position. The child may not feel comfortable with anyone else, so it is important that the encounter goes well for the child. Schools ensure all staff are knowledgeable on how to deal with a disclosure:

- Listen carefully to what the child is saying – be patient and allow the child to move at their pace.
- Let them know they've done the right thing speaking up – assure but don't give own opinions.
- Tell them it's not their fault – important they hear this as some will blame themselves.
- Say you'll take them seriously – they may have held their secret for fear of not being believed.
- Don't confront the alleged abuser – this could make the situation worse.
- Explain what will happen next – never promise confidentiality and assure support.
- Report what the child has disclosed as soon as possible – in person or by phone.
- Record what the child has disclosed as soon as possible

In addition to verbal disclosures, schools employ other systems, e.g. online system as some pupils may find face-to-face reporting difficult. When staff speak to any child who may be suffering from **honour-based abuse**, it is important to be aware of the 'One Chance' rule which dictates that "we may only get one chance to speak to the victim, and to act on any abuse." It is essential that action is taken without delay.

30. Gender Questioning Children & Social Transitioning (see section 12)

Schools must treat gender-questioning requests with a professional curiosity, through a cautious, safeguarding-led framework that prioritises parental involvement, treats social transition as an active intervention, and prohibits staff from initiating social changes independently.

General guidance for schools to follow

- **DSLs** should have a significant role in all cases.
- **Schools should not initiate social transition** such as changes to names, pronouns, uniforms, or facility use (see section 12). This only applies when a child or parent raises a request and school makes a formal decision to do so after consideration and discussions.
- **Social transition is recognised as having potential psychological and long-term impacts**, requiring extreme caution—particularly for primary-aged children, where it should occur only very rarely. Consideration of age, maturity and vulnerabilities should be made on an individual case-by-case basis.
- **Parents should normally be involved** unless doing so would place the child at risk of harm. The threshold is high. Parental views, as well as pupil's views, are of course very important.





- **Schools are expected to keep clear, contemporaneous, and written records** of any risk assessments, rationale, and decisions involving gender-questioning pupils.
- **Schools should ensure that a child may not use facilities for the opposite biological sex.** Where a child does not wish to use their biological sex facilities, consider whether an alternative can be provided without compromising the safety or dignity of any other child
- Schools should handle sports for gender-questioning children by separating groups based on biological sex where safety or fairness requires it, while carefully evaluating individual requests.
- **Schools must strictly maintain single-sex overnight accommodation based on biological sex**, with no sharing permitted between mixed biological sexes, while considering alternative individual arrangements that do not compromise privacy or dignity.

31. Handling Allegations against staff

SET and all schools will employ procedures aimed at preventing adults who pose risks to children from working in our schools by ensuring that all statutory checks are conducted. We recognise the possibility that an adult may cause harm to a child and/or may have behaved in a way that indicates that they may not be suitable to work with children. Schools have in place procedures to react to any situation where this may be a concern, in line with KCSiE Part Four.

These procedures will be followed where it is alleged that anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors have reached one of the main **Harm thresholds**:

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

Low-level concerns: In addition, schools will have processes in place to deal with, what are termed, 'low-level concerns' (including allegations) which do not meet the harm threshold, e.g. being over friendly with children, having favourites, taking photographs of children on their mobile phone contrary to school policy, engaging with a child on a one-to-one basis in a secluded area, or humiliating pupils.

Reporting: Concerns about any adult in school will be reported to the relevant senior member of staff immediately, usually the Headteacher (low-level concerns may be reported to a nominated senior leader). If the concern is about the Headteacher, then to the Chair of the School Council





or relevant SET central team member.

Protecting Staff from malicious allegations: It is also important for staff to protect themselves against allegations of abuse. Where an allegation is very quickly proven to be false or malicious, the Headteacher will make the appropriate decision best suited on a case-by-case basis, ensuring full information is recorded.

Staff Behaviours: It is important for staff to adhere to relevant HR policies which will help protect them, e.g. Staff Code of Conduct, Acceptable Use Policy (Use of IT), where clear expectations of staff behaviours are outlined and must be followed by all staff, trainee teachers, volunteers and any adults assigned to work with pupils.

Protocols staff follow for keeping themselves and pupils safe, need to be balanced with the needs of the child and it may be that privacy is key when a disclosure is being made and staff should use their professional judgement at all times looking to safeguard themselves and the child.

Restrictive Interventions: Any use of physical force or restraint against pupils/students will be carried out in line with Trust wide policy and procedures (see relevant Restrictive Intervention Policy).

Investigation: Following an allegation, the Headteacher, will carry out a very prompt initial investigation, and possibly in consultation with trust colleagues, will then decide on next actions which may include:

- initiating a full investigation
- contacting the Local Authority Designated Officer (LADO)
- consideration of suspension for the member of staff
- contacting external employers for supply staff and contractors, etc.
- informing pupil and parents of ongoing actions, as appropriate in line with staff confidentiality procedures

The above procedures may also be employed, including the LADO, where a disclosure/allegation occurs about an adult who is not an employee, e.g. supply teacher, sports coach, contractor, or even a company who use school facilities in the evening when working with children.

Communication and Support: Where a serious safeguarding concern involving a current or former member of staff, or any adult working or undertaking training within the school, comes to the attention of Trust or School leaders, appropriate action will be taken to ensure clear and





formal communication with relevant parents and pupils where necessary. If the individual remains in post, a robust risk assessment will be implemented and regularly reviewed.

Any communication regarding the matter will be carefully managed to ensure compliance with statutory requirements, including employment law, data protection legislation (GDPR), and any ongoing investigative processes.

Information will also be provided on how parents, carers and pupils can raise further questions or concerns, together with details of available safeguarding support and signposting services, where appropriate.

The school may conduct a 'pupil impact review' if deemed relevant to the case.

32. Handling Allegations of Child-on-Child Abuse, including Sexual Violence and Sexual Harassment (see Section 16)

This section will focus mainly on harmful sexual behaviour. Part Five of KCSiE is dedicated to 'child-on-child sexual violence and sexual harassment' and outlines procedures schools should adopt to support all children in a case-by-case approach. Where proven, schools within SET will take a zero-tolerance approach to sexual violence and sexual harassment.

Schools will decide on a relevant course of action and below is listed good practice in a range of procedures to minimise risk of child-on-child abuse.

Staff Responsibilities:

- Be alert to signs of any abuse, including harmful sexual behaviour, sexual harassment, and sexual violence.
- Take all reports seriously.
- Follow school safeguarding and reporting procedures.
- Support victims and perpetrators, protecting their education and wellbeing.
- Include external agencies when relevant.
- Maintain open channels of communication with relevant parties.



Curriculum: Schools have a comprehensive RSHE (Relationship, Sex and health Education) curriculum in place which includes relationships and how children can create and maintain



positive relationships out of respect for each other irrespective of culture, race, gender etc. Schools ensure both in lessons and 'on the corridor' staff promote this respect for each other and encourage all children to see positive relationships as key to their success. Processes during an investigation should be explained clearly to pupils involved.

Investigation: Each allegation will be investigated. Following each investigation, school leaders will decide on next steps considering the welfare of those involved and ensuring children are safe from harm.

Support: Regarding child-on-child sexual abuse, the school will adopt the process of support as suggested in KCSiE Part Five. whilst supporting all individuals involved, including alleged victim and alleged perpetrator.

Referrals: Schools have detailed referral processes in place as indicated in Annex C of this document and ensure that children have a system of reporting concerns. All staff are trained to handle disclosures and can ensure children feel safe and secure when raising a concern. Schools work closely with external agencies and safeguarding partners to ensure reporting and support is effective.

Recording: Schools will record all allegations and information on their relevant system.

Vigilance & Reporting: Staff will always remain vigilant as schools are aware that lack of reports does not necessarily mean a lack of incident. Children do find coming forward difficult at times and each school has in place a reporting mechanism for pupils promoted within each school and evidenced in Annex C of each school's edition of this document.

Violence Against Women and Girls (VAWG) strategy was introduced in December 2025 to ensure that the next generation of girls will be better protected from violence, and young boys to be steered away from harmful misogynistic influences. It advocates early intervention and education. Our schools will challenge all types of abuse and discriminatory behaviour by pupils on other pupils whilst all the time realising that support is needed on 'both sides' to ensure prevention of further negative behaviours. Our processes for child-on-child will be used and adapted to manage any concern of abuse between pupils.

All staff must report any concerns to the DSL in accordance with our reporting procedures.

33. Online Safety (see section 23)

SET Online Safety Policy outlines some of the actions taken by schools in protecting children from online risks.





Filtering & Monitoring: As part of this process, SET schools have appropriate filters and monitoring systems in place. This is a combination of software in place that restricts 'unwanted' content being available on the school's internet system, i.e. 'filtering'. This can be done by blocking some websites, and/or identifying the use of keywords to ensure the content available to pupils inschool is safe and appropriate. In addition, when issues are identified, keystaff are informed via the software in place and then act from a safeguarding perspective in identifying the pupil and ensuring they are safe, i.e. 'monitoring'.

Schools consider the age range of their children, the number of children, how often they access the IT system and the proportionality of costs vs risks when deciding the 'setting' of the F&M system. SET has a specific internal F&M Policy with guidance for schools on checking online behaviours and systems.

Curriculum: schools have a planned online safety education curriculum taught to all pupils which includes; sharing nude and semi-nude images / cyber-bullying / grooming / radicalisation online / appropriate online behaviours, etc.

Relevant staff policies: staff adhere to staff code of conduct and the Trust's Acceptable Use Policy which outlines expected online behaviours, including personal use of social media.

Reporting: pupils and staff are informed how to report any online concerns and what to do if any inappropriate material bypasses the school's F&M system, which can occasionally occur due to the behaviours of deviant external adults.

Staff training: as part of general staff training, regular updates on online safety is covered.

Signposted online support: for pupils and parents, e.g. CEOP.

Artificial Intelligence: as this area grows, so does the misuse of AI. The Trust has policy and procedures for managing the development of artificial intelligence systems and platforms.

Mobile Phone-free Schools: In line with statutory requirements, all schools should be mobile phone-free environments by default; anything other than this should be by exception only. The DfE expects schools to have a system in place whereby pupils do not have access to their mobile phone throughout the school day including during lessons, the time between lessons, breaktimes and lunchtime.

Parental Responsibility: School will reinforce the importance of children being safe online at home and it will be especially important for parents to be aware of what their children are being asked to do educationally online as well as how they spend social time on their devices.

Guidance: As the risks of online abuse is a key safeguarding aspect, there are lots of advice and guidance available on this subject online such as provided by NSPCC, DfE (including within





KCSiE), E- safety for schools, and UK Safer Internet Centre. In addition, SET have an Online Safety Policy and Monitoring and Filtering Policy procedures in place. These are key for advice and guidance around this subject.

34. Mental & Emotional Health (see Section 21)

Trust-centred Approach: Each school in our Trust has a Mental health Lead who works with school leaders to ensure support and provision is in place to support identified pupils. In addition, there is a Trust-wide strategy, policy and network, where leaders meet regularly to share practice and develop standardised approaches so that the very best practice in our schools exists.

Assessment: Only trained professionals can diagnose mental health conditions, but schools have trained staff who are well placed to observe pupils day-to-day and identify behaviour which may suggest a mental ill-health. Signs can be varied and similar to signs of any number of issues but can generally include:

- Risk to self – behaviour which places the individual in possible harm. Possible signs of self-harm, suicide ideation, or even worse.
- Engagement – lack or over-engagement in social situations, significant changes in behaviour.
- Self-Regulation – inability to self-regulate under normal conditions, lethargic/sleepy, over-stimulated.
- Test/Diagnosis – external diagnosis of an aspect of mental ill-health.

Support: Schools offer support to pupils who may be experiencing low-level mental ill-health. For issues above this, external agencies are required. Across our Trust a variety of support systems are in place, both in-house and externally. It must be noted that the following list includes examples of support across our Trust, and not what each school has. Each school will outline its own provision at the end of their Mental health Policy:

- **Trained Staff:** each school has staff who have participated in mental health training above that done by all staff.
- **Counselling:** usually 6-week of sessions to support pupils.
- **ELSA:** Emotional Literacy Support Assistant. This is a nationwide educational project where teaching assistants are trained to help children manage their emotional and social wellbeing in schools.
- **Safe Spaces:** Calming physical environments or sensory rooms where overwhelmed students can decompress.





- **Mental Health Support Teams (MHSTs):** NHS-linked teams providing early, evidence-based interventions for mild-to-moderate issues like anxiety and low mood. (Determined by location but being rolled out nationwide)
- **Educational Psychologists:** Specialists who assess learning, behavioural, and emotional hurdles to create tailored student plans. Referral by school does not guarantee intervention.
- **External Referrals:** Formal pathways to connect families with community services or Child and Adolescent Mental Health Services (CAMHS) for complex medical needs.

DfE Advice and guidance are available for schools and families.

35. PREVENT Duty & Channel (see Section 24)

Channel: The national initiative to safeguard people from radicalisation is Prevent and referrals of cases occur through the Channel Programme. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. The programme uses a multi-agency approach to protect vulnerable people by:

- identifying individuals at risk
- assessing the nature and extent of that risk
- developing the most appropriate support plan for the individuals concerned.

Anyone, including family members, can make a referral to their local Channel. Each referral is screened by the local authority and if deemed appropriate, further action will occur including communication and consent with the individual to initiate a Panel. The Panel will then decide what, if any, support is needed to protect the individual.

Nominated staff: All SET schools will have a 'single point of contact'/identified member of staff where concerns can be reported to.

Risk Assessment is in place in all schools and updated annually.

Staff PREVENT Training is regularly to ensure vigilance remains high.

Visiting Speakers clear protocols are in place to ensure suitability and supervision within school.

British values are promoted within the curriculum and extra-curricular activities and reflected in the general conduct of the school.





Key staff participate in extra training to give them deeper knowledge and confidence to identify children at risk of being drawn into terrorism and challenge extremist ideas. Staff know where and how to refer children and young people for further help.

Filtering & Monitoring systems are set to pick up any behaviours online which may warrant concern.

36. Reporting a Concern/Making a Referral

All staff, volunteers and visitors have a responsibility to report any concerns about the welfare and safety of a child and all such concerns must be taken seriously. Depending on the nature of the concern, the DSL (possibly in consultation with senior leaders) will decide on course of action. In addition, schools must know how and to whom external referrals should be made.

Reporting: on point of being aware of a concern, staff will report it to a member of the safeguarding team or appropriate senior leader, preferably before recording it. For most incidents this must be actioned in person, and this may be face-to-face or by phone. Staff should not rely on an electronic entry, e.g. email or entry onto My Concern/CPOMs being picked up immediately.

Some low-level incidents may not need 'face-to-face' direct reporting and recording on the appropriate system may be sufficient in terms of reporting, **but** where a member of staff is unsure, or school guidance dictates, staff should report directly to the safeguarding team as above.

The DSL will then assess entries on the system and act accordingly.

If the concern is about the DSL, then the Headteacher or SET link should be informed.

Reporting on/Referral: The DSL will then consider who else should receive a report of the incident/concern, including external agencies, e.g. social care, police, channel, etc. and of course parents, unless reporting will place the child in further harm. The decision to contact the LADO, TRA and DBS must always sit with the Headteacher, not the DSL, although the DSL may be asked to action the referral.

Further Referrals: The document 'Working Together to Safeguard Children' sets out the steps that practitioners should take when working together to assess and provide services for children who may be in need, including those suffering harm. The flow charts cover:





- the referral process into local authority children's social care
- immediate protection for children at risk of significant harm
- the process for determining next steps for a child who has been assessed as being 'in need'

DSLs must be aware as to the local levels of threshold and referral systems within their local authority. These are detailed in Annexes section of this document. In addition, guidance as to when to call the police (NSPCC) is important for DSLs to be aware of.

Pupil Reporting: Pupils must be aware of how to report a concern. SET schools should have systems in place so that it is clear to pupils how to do so, either face-to-face, or by another method, e.g. My Voice (for schools using My Concern). Staff are aware that face-to-face can be difficult for some pupils so an alternative method should be available.

Regarding HBA (Honour-based Abuse), when a school has concerns about any possible incident, they in the first instance refer to appropriate professionals, not the family, which may further complicate matters and put the child at further risk.

37. Record keeping

All concerns, discussions and decisions made regarding safeguarding concerns will be recorded in writing. Information should be kept confidential and stored securely. All SET schools have electronic recording systems, either My Concern or CPOMS, where all staff record detail. Records should include:

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

SET schools will keep and maintain up-to-date information on pupils on the school roll, including where appropriate child protection records which are kept confidentially and securely and are separate from general pupil records until the child's 25th birthday.

When a pupil transfers to another institution, child protection information will be copied and sent independently of other information to any new school / college whilst the child is still under 18 years old. Leaders must ensure that a receipt of delivery is provided by the next school or college.

COAC: when recording incidents, all staff are encouraged to:

- **Concise:** ensure entries are brief and accurate, ensuring pupil statements are recorded verbatim.





- **Objective:** only objective, professional comments accompany the entry.
- **Actioned:** every member of staff includes the actions they have taken at each stage of dealing with the incident.
- **Closed/Completed:** safeguarding staff ensure incidents are closed/filed properly with summaries included.

SET schools must take into account policies regarding the General Data Protection Regulations (GDPR).

38. Safer Recruitment

SET's recruitment and selection policies and procedures adhere to the guidance set out in Part Three of KCSiE. Schools will be expected to carry out an online search of publicly available information on shortlisted candidates which may identify issues which need to be explored at interview.

Single Central Record: Each school will have its own Single Central Record (SCR) and the headteacher is responsible for ensuring the SCR is compliant, and it will be checked periodically by Trust central staff.

At least one member of each recruitment panel must have undertaken safer recruitment training. It is the responsibility of the Headteacher and Academy Council Chair to ensure that this requirement is fulfilled.

39. Site Safety

Site checks: Effective safeguarding measures also include ensuring the physical site of our schools are safe for our pupils and staff. To that extent extensive Health & Safety policies are in place and adhered to. This includes regular checks of perimeter fences, adequate pupil supervision during the school day including social times, appropriate risk assessments, and clear processes for the management of site safety.

Visitors: In addition, all schools have robust visitor, and external adult entry procedures conducted to ensure all adults who enter school, are safe.





40. Staff Training, Induction and Supervision

Training: Whole staff training on basic child protection and safeguarding takes place every year with all staff participating in safeguarding update information. In addition, all staff are involved in a continuous programme of safeguarding training and information both online and face-to-face.

Other adults: Trustees, Academy Councillors, trainee teachers, volunteers, and supply staff likewise receive appropriate safeguarding training relevant to their roles. All new staff follow a comprehensive induction programme which includes safeguarding training and understanding of all school systems.

The Headteacher will ensure that there is a written code of conduct in place for staff, including volunteers and supply staff, which staff must adhere to.

DSL Training: The DSL and Deputies will receive refresher training every two years as well as further training at the appropriate level and above on specific matters such as, issues relating to special educational needs and disability, online safety and prevention of radicalisation.

Supervision: DSLs and key staff who deal with safeguarding issues also receive 'supervision' which is dedicated time to support and develop them in their roles as well as support them emotionally. School Council Safeguarding Leads are in place and will also receive appropriate training.

41. Teaching Safeguarding

Curriculum: All pupils have access to an appropriate curriculum, differentiated to meet their needs which enables them to learn to develop skills to build self-esteem, respect others, defend those in need, resolve conflict without resorting to violence, question and challenge and to make informed choices in later life.

The school's RSHE/PSCHE Curriculum includes aspects of safeguarding which sits alongside other activities, including visits by external agencies, to provide opportunities for pupils to discuss and debate a range of subjects. All pupils will be taught about safeguarding, including online safety and how to keep themselves safe in a range of situations. Safeguarding is also taught across many other aspects of the school formal and informal curriculum, e.g. IT lessons and assemblies.



All pupils will be taught about the systems in school for keeping them safe and as a result, will



know there are adults in school whom they can approach in confidence if they are in difficulty or feeling worried, and that their concerns will be taken seriously and treated with respect.

42. Whistleblowing

SET is committed to the highest standards of openness, probity and accountability; and to safeguarding the public resources for which it is responsible. We always expect all its staff and representatives to operate honestly and with integrity. Misconduct or wrongdoing will not be tolerated. SET actively encourages its staff and other stakeholders to offer constructive advice and criticism and to speak up, or “blow the whistle” if they genuinely think something is wrong. The Whistleblowing Policy and procedure applies to all colleagues. Regarding safeguarding, if an employee suspects wrongdoing at work in regard to any actions to safeguarding practice, they should report to appropriate person, e.g. DSL, Headteacher, Chair of School Council or LADO depending on nature of concern.

43. Working with others including Parents and Multi-Agencies

SET schools will develop and maintain effective links with other relevant agencies and work with these agencies to ensure that the welfare of pupils is promoted and that they are protected from harm. Inter-agency working in each school must reflect the arrangements of the three local safeguarding partners (LA, Health and the Police).

Social Worker: The schools will notify the allocated social worker/social care if:

- It has been agreed as part of the any CP plan or core group plan
- A child is subject to a CP plan is to be permanently excluded.
- There is an unexplained absence of a pupil who is subject to a CP plan
- If a child is under private fostering arrangements
- Any other reason cited within KCSiE and Working Together.

Parents: SET’s approach to working with parents is one of transparency and honesty and our responsibility is to safeguard and promote the welfare of all the children in our care. We aim to do this in partnership with our parents. In most cases parents will be informed when concerns are raised about the safety and welfare of their child and schools will ensure that they have at least two emergency contact details for each child. Parents should be given the opportunity to address any concerns raised.

Parents will be informed if a referral is to be made multi-agency referral teams or any other agency.

Parents will not be informed if it is believed that by doing so would put the child at risk. In such





cases the DSL or Headteacher will seek advice from their local safeguarding partners.

Other Agencies: Our schools will also at times work with other agencies/external providers to best suit the needs of its pupils, which may include the use of Alternative Provision. Our schools ensure a full risk assessment is carried out prior to the placement of any child in any external provision. This includes pupils who may experience a work experience placement.

Early Help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years. Early help can also prevent further problems arising; for example, if it is provided as part of a support plan where a child has returned home to their family from care, or in families where there are emerging parental mental health issues or drug and alcohol misuse.

Effective early help relies upon local organisations and agencies working together to

- identify children and families who would benefit from early help
- undertake an assessment of the need for early help
- provide targeted early help services to address the assessed needs of a child and their family which focuses on activity to improve the outcomes for the child.

For further information on Early Help and wider Safeguarding work by other agencies, please read the most up-to-date version of 'Working Together to Safeguard Children'.





SECTION E: ANNEXES

ANNEX A: School details and Personnel

Name	Role	Contact details
Jeremy Swinn	Headteacher	0161 850 9196
Lucy Williamson	Designated Safeguarding Lead (DSL)	0161 850 9196
Clare Shiel Jonah Stancombe	Deputy Designated Safeguarding Lead(s)	0161 850 9196
Lisa Duncalf	Academy Council SG link	0161 850 9196





ANNEX B: Local Safeguarding Partners

SET schools are currently across eight local authorities as listed below. Further information about contacts and support our school may use is listed below:

Local Authority	Safeguarding Partnership	Contact Number
Birmingham	Birmingham Safeguarding Children Partnership	0121 464 2612
Bury	Bury Bury Integrated Safeguarding Partnership	0161 253 6153
Cheshire West & Cheshire	Cheshire West and Chester Safeguarding Children Partnership (SCP)	01513566835
Derby	Derby & Derbyshire Safeguarding Children Partnership	01332 642 351
Halton	Halton Children and Young People Safeguarding Partnership	N/A
Staffordshire	Staffordshire Safeguarding Board	01785 277 151
Stoke-on-Trent	Stoke-on-Trent Safeguarding Children Board	N/A
Wigan	Wigan Safeguarding Children Board	N/A
Wirral	Wirral Safeguarding Children Partnership	N/A
Wolverhampton	Wolverhampton Safeguarding Together	01902 550 477





Local Agency details and contact information:

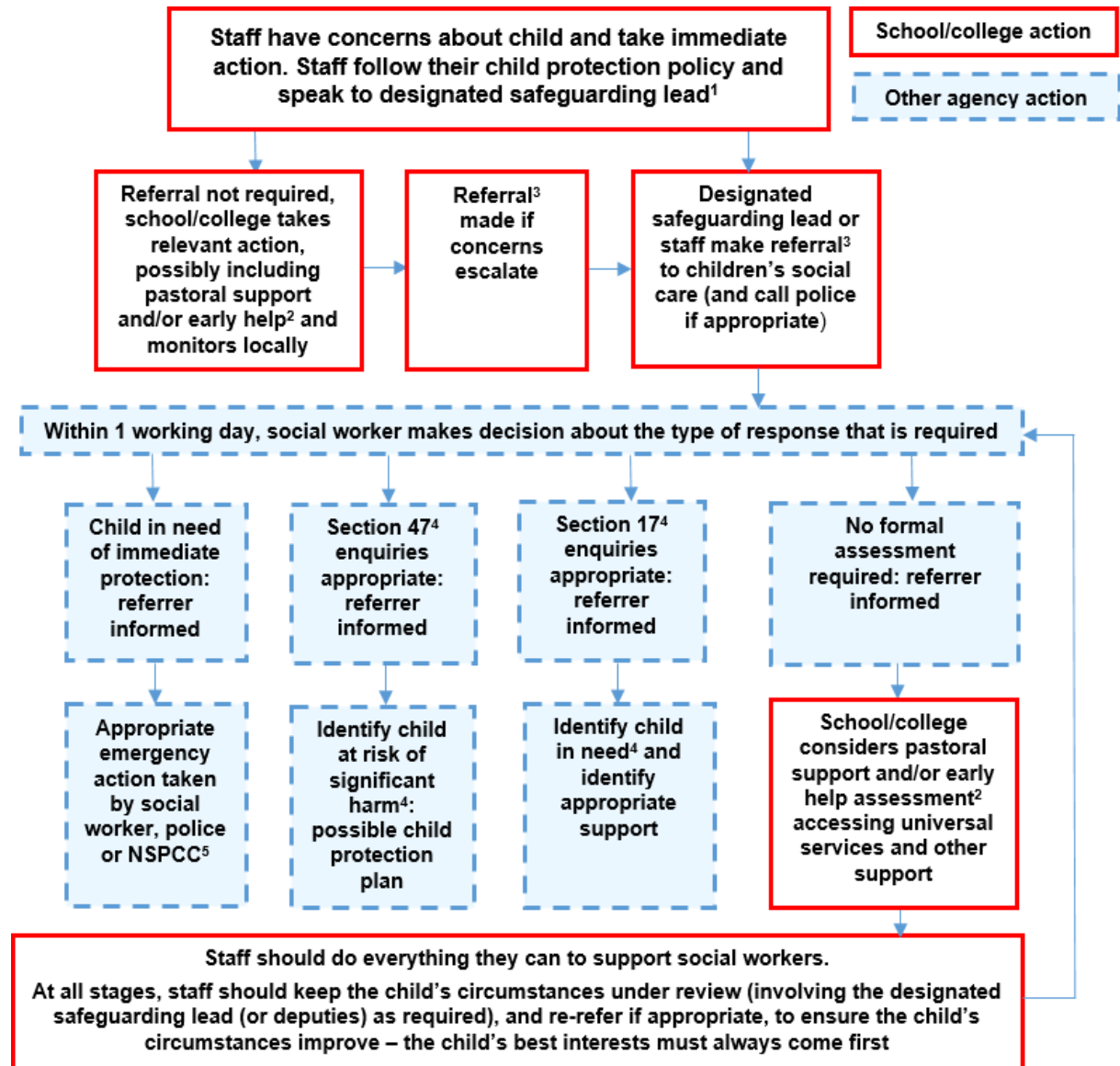
Agency	Details
Bury Multi-Agency Safeguarding Hub (MASH)	Main number: 0161 253 5678 Out of hours: 0161 253 6606 Email: childwellbeing@bury.gov.uk Bury online referral: Bury council directory
Bury LADO	0161 253 5342





ANNEX C: Referral Procedures

Below is Referral process Chart taken from KCSiE.



Brookhaven School staff formally report concerns via the My Concern platform. MASH referral made online via Bury Council Directory website. Children can raise a concern using 'my voice'. The corresponding QR code is available on our website and located within the school.





ANNEX D: Schools that offer Residential provision (additions to Policy)

This Safeguarding Policy covers many aspects of residential provision in recognition of possible issues and practices to minimise safeguarding risks. However, we understand the unique circumstances of residential provision and in line with KCSiE and National Minimum Standards for Residential Special Schools, this annex details any further safeguarding procedures.

The latter document states that an School's Safeguarding & Child Protection Policy should reflect:

- the school's policy on sexual relationships between children (and importance of children understanding this policy);
- Sections 15, 26, and 31 all refer to some aspects of child-on-child sexualised behaviours, and section 39, 'Teaching Safeguarding' states that pupils are taught about sexual relationships, including sexual health as part of their RE/SRE curriculum.
- Our residential provision has clear guidance around personal privacy and appropriateness of behaviours between pupils and these guidelines are communicated to pupils within the setting, whilst under the supervision of staff.
- the school's approach to child-on-child abuse, reflecting the unique nature of residential accommodation and the risks associated with children sharing overnight accommodation;
- Aspects of child-on-child abuse are documented within the Policy including possible symptoms, action to take and handling allegations. Sections 9, 15, and 31.
- Our residential provision has clear guidance around personal privacy and appropriateness of behaviours between pupils and these guidelines are communicated to pupils within the setting, whilst under the supervision of staff.
- the approach to protecting children where there is a significant gender imbalance in the school;
- Our residential provision has clear guidance around personal privacy and appropriateness of behaviours between pupils, respective of many aspects including gender. These guidelines are communicated to pupils within the setting, whilst under the supervision of staff.
- the approach to harmful online content and how children's devices are managed in terms of bringing a device into the school, and harmful content that may already be downloaded on to it, and the opportunity to download harmful content via 3, 4 and 5G that will bypass the school's filtering and monitoring systems.
- There is a Trust-wide Online Safety Policy adopted by all Schools and rigorous monitoring and filtering systems within our School.
- Online/E-Safety dangers and preventative actions are documented within the Policy, namely in Sections 1, 3, 8, 9, 11, 15, 16, 17, **23**, 24, 31, **32**, 38, and 39.



Opportunity



Integrity



Community



Equity



Working together to inspire communities where every school
is valued, every voice matters and every learner thrives.



**Shaw
Education
Trust**

Shaw Education Trust Head Office,
Kidsgrove Secondary School, Gloucester Road,
Kidsgrove, ST7 4DL

Email: info@shaw-education.org.uk

Call: 01782 948259

Visit: shaw-education.org.uk

LinkedIn: [@ShawEducationTrust](https://www.linkedin.com/company/ShawEducationTrust)