Twyford CofE Academies Trust

Document Title	**Child Protection Policy**
Committee Responsible for Policy	**Board of Directors**
Review Frequency	**Annually (statutory requirement)**
Last Reviewed	**September 2026**
Next Review Due	**September 2027**
Policy Author	**P Bennett (Twyford Associate Headteacher) and Designated Safeguarding Leads (DSLs)**

Assessment of the Impact of a Policy on Equality & Diversity

Policy: Child Protection Policy	
Impact assessed by: R Lane	**Date:** 30/09/21
1. What is the potential for this policy impacting a person or group with a protected characteristic differently (favourably or unfavourably) from everyone else? The Policy is part of the Trust's system for ensuring that people in protected groups are not treated more or less favourably than others.	
2. How would this be evidenced? Through regular monitoring of the application of the Policy by LGB and the minutes of these committees.	
3. Is there evidence that the operation of the current policy might impact a person or group with a protected characteristic differently from everyone else? ~~YES~~/NO	
4. If the answer to 3 is 'Yes', please provide details and evidence.	
5. How might the new policy change this?	
6. Are there any other changes to the policy which might impact a group with a protected characteristic differently from everyone else? YES/~~NO~~	
7. If the answer to 6 is 'Yes', please provide details and evidence. New provisions for preventing extremism might adversely impact religious or ethnic groups. Care needs to be taken to ensure these provisions are applied in a balanced calm and proportionate way.	
8. Policies are required to reduce or eliminate inequality and disadvantage and promote diversity. Does this assessment indicate that the Policy passes or fails this test? PASS/~~FAIL~~	

Child Protection Policy

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1 Policy and Aims

1.1 Statement of Principle

Twyford C of E Academies Trust fully recognises its responsibilities for safeguarding students from significant harm. The purpose of this document is to assist all staff to protect and safeguard students who are at risk of significant harm and to prevent the impairment of a student's health or development. We, at Twyford Trust, aim to undertake our safeguarding role to enable students to have optimum life chances and enter adulthood successfully. This policy should be read in conjunction with the relevant sections of the **London Safeguarding Children Procedures (LSCP)**. This policy also reflects the statutory requirements of Working together to Safeguard Children (July 2018) and **Keeping Children Safe in Education (KCSIE) (September 2026)**

Twyford C of E Academies Trust is committed to Safeguarding and Promoting the Welfare of all of its students.

- The Trust recognises that Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interests** of the child.
- The Trust plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict.
- In line with the 'Working Together to Safeguard Children' 2026 guidance, Safeguarding and promoting the welfare of children is defined as:
    - Providing help and support to meet the needs of children as soon as problems emerge
    - Protecting children from maltreatment, whether this is within or outside the home, including online
    - Preventing the impairment of children's mental and physical health or development
    - Making sure 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
- *('Keeping Children Safe in Education defines children as everyone up to the age of 18. For the purpose of this policy 'child' covers all students in full time education in Trust schools).*
- KCSIE 2026 and Working Together to Safeguard Children 2026 strengthen the expectation that safeguarding is child-centred, coordinated and based on the right help at the right time. The Trust will use the terminology of universal services and

community-based early help and the targeted early help level of Family Help where applicable locally. The policy should be read alongside KCSIE 2026 and Working Together to Safeguard Children 2026.

- The Trust recognises that no single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.
- KCSIE 2026 also requires staff to remain alert to overlapping harms and to extra-familial harms, including teenage relationship abuse, financial exploitation, modern slavery, criminal and sexual exploitation, serious youth violence and radicalisation. Safeguarding practice should also recognise prejudice-based harm, including racism and faith-based prejudice.

Each student's welfare is of paramount importance. We recognise that some students *may* be especially vulnerable to abuse. We recognise that students who are abused or neglected may find it difficult to develop a sense of self-worth and to view the world in a positive way and their behaviour may be challenging. We recognise that, irrespective of whether a student is abused, they may have issues relating to their mental well-being and engage in self-harm and that there is a distinct link between safeguarding and mental health. We also recognise that we have a duty to prevent students becoming radicalised and to protect those at risk from criminal and sexual exploitation. We will always take a considered and sensitive approach in order that we can support all of our students.

1.2 Aims

Our policy applies to all staff, directors, governors and volunteers working in the school. There are nine main elements to our policy:

- Ensuring we practise safe recruitment in checking the suitability of staff and volunteers to work with students
- Raising and maintaining understanding and awareness of all safeguarding issues amongst staff and students and equipping children with the skills needed to keep them safe, both mentally and physically
- Alerting staff to warning signs and risk factors.
- Developing and implementing systems and procedures through the use of the Child Protection Online Management Systems (CPOMS) for identifying and reporting cases, or suspected cases, of significant harm.
- Supporting students who have been abused in accordance with their agreed child protection plan.
- Ensuring that safeguarding arrangements reflect the KCSIE 2026 focus on Violence Against Women and Girls (VAWG), misogyny and misandry, safe and effective use of generative AI, mobile phone safety, safeguarding in sport and activities using school premises, and the safeguarding of children with medical conditions and young carers.
- Providing guidance for staff dealing with students with mental health issues and support to students who self-harm and their peers and parents/carers.
- Providing guidance for staff dealing with students at risk of radicalisation
- Establishing a safe environment in which students can learn and develop

We recognise that because of the day-to-day contact with students, school staff are well placed to observe the outward signs of abuse, self-harm, radicalisation, changes in behaviour or a student's failure to develop. They are advised to be alert to possible concerns.

Each school will therefore:

- Establish and maintain an environment where students feel secure, are encouraged to talk, and are listened to
- Ensure students know that there are adults in the school whom they can approach if they are worried.
- Deliver a detailed personal, social, health and economic **(PSHE)** education **/** relationships and sex education **(RSHE)** programme*, enabling our or students to develop the skills they need to recognise and stay safe from all types of abuse
- Identify where there are welfare concerns and take action to address them, in partnership with other agencies where appropriate
- Have a zero-tolerance culture towards any forms of discrimination.

Details of local arrangements at each school are found in Appendices A and B.

*PSHE and RSE provision is reviewed regularly against Government Guidance to ensure full and appropriate coverage; revised guidance on Relationships, Sex, and Health Education was published July 2025 for introduction September 2026 and as such a review will be undertaken during the 25/26 academic year to ensure provision from September 2026 meets renewed Guidance.

2. Equality statement

Some children have an increased risk of abuse 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 (SEN) or disabilities or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- 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 FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- may need additional support, including pregnancy and/or parenthood, early signs of abusive, violent or harmful behaviour, repeated classroom removal or suspensions, risk of permanent exclusion, parental offending or custody, modern slavery/trafficking, and private fostering. Staff should also consider additional barriers faced by children with SEND and children with medical conditions.
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)
- Are missing or absent from education for prolonged periods and/or repeated occasions.
- Have a parent/carer that has expressed an intention to remove them from school to be home educated

The Trust will ensure that robust arrangements are in place to maintain DSL cover whenever the DSL is unavailable, including clear, reliable and known routes for raising concerns. Where appropriate, this may include a confidential shared safeguarding mailbox or equivalent system so that concerns are received, monitored and acted upon without delay.

3. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026), and the Maintained schools: governance guide. We comply with this guidance and the arrangements agreed and published by our 3 local **safeguarding partners** (see section 3).

This policy is also based on the following legislation:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to have completed safer recruitment training
- Part 3 of the schedule to The Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 (as amended by the Protection of Freedoms Act 2012 and The Crime and Policing Act 2026), which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive

action to deal with particular disadvantages affecting a specific group of pupils (where we can show it's proportionate). This includes a duty to make reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as: sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination
- Operation Encompass statutory guidance, which explains that the police must notify our school of any incidents involving domestic abuse

4. Procedures

We will follow the procedures set out by the Local Safeguarding Children Board and take account of guidance issued by the Department for Education, the Local Authority and other relevant bodies.

4.1 Roles and Responsibilities

We will ensure that we appoint at least two members of staff from each school's leadership team. One of the two will be the Designated Safeguarding Lead. Another should be the Deputy Safeguarding Lead. Other designated staff will receive appropriate training (updated every two years) and support for their role.

The Designated Safeguarding Lead (DSL) in each school will (see appendix C):-

- Be a member of the senior leadership team
- Implement this policy;
- When the DSL is absent the deputy will act as cover.
- If the DSL and deputy are not available or absent, we have cover arrangements in place. This includes a shared safeguarding team mailbox and a joint safeguarding contact/extension so other member of the safeguarding team can act on safeguarding concerns
- Refer cases of suspected abuse, self-harm, radicalisation or allegations to the relevant investigating agencies;
- Act as a source of support, advice and expertise within the educational establishment; liaise with the Associate Head teacher / Head teacher to inform them of any issues and ongoing investigations and ensure there is always cover for this role;
- Recognise how to identify signs of abuse, self-harm or radicalisation and when it is appropriate to make a referral;
- Monitor the help, support and progress of the pupils;
- Have a working knowledge of how Ealing Safeguarding Children Board operate, the conduct of a child protection case conference and be able to attend and contribute to these;
- Initiate Ealing's Early Help Assessment and Plan (EHAP) for self-harm concerns if necessary;
- Be fully aware of the school online safety, filtering and monitoring processes
- Identify an individual to act as Prevent Single Point of Contact and make referrals to the Channel panel;
- Be aware when it is essential for outside agencies to be informed;

- Report any mention of suicidal feelings as a matter of urgency;
- Ensure that all staff have access to and understand the school's child protection policy;
- Ensure that all staff have training on this policy at least every year and that induction training is provided for new members of staff;
- Ensure First Aiders are particularly well informed about self-harm;
- Keep detailed accurate secure written records and/or concerns through effective use of CPOMS;
- Work with relevant leaders to promote the educational outcomes of children who have or have had a social worker, including by ensuring that safeguarding information informs appropriate academic and pastoral support and reasonable adjustments where needed.
- Obtain access to resources and attend any relevant or refresher training courses at least every two years;
- Ensure the Child Protection Policy (including online safety), procedures and implementation are updated and reviewed annually and work with the Board of Directors and Local Governing Bodies regarding this;
- Ensure parents are made aware of the child protection policy which alerts them to the fact that referrals may be made and the role of the school in this to avoid conflict later;
- Inform parents about any mental health concerns if appropriate and liaise with them as to how best to manage the situation;
- Where a child leaves the school, ensure the child protection file is copied for the new school as soon as possible and transferred to the new school separately from the main pupil file. If a child goes missing or leaves to be educated at home, then the child protection file should be copied and the copy forwarded to the relevant Education Social Work Service;

The DSL will also:

- Keep the Headteacher/Associate Headteacher informed of any issues
- Ensure that child protection files are kept up to date
- Where children leave the school, ensure their child protection file is transferred to the new school
- Ensure every member of staff and the directors and governors know the names of the Designated Safeguarding Officers and understand their responsibilities in being alert to all the signs of abuse, mental health issues including self-harm, FGM, child criminal and sexual exploitation, County Lines or radicalisation and for referring any concerns to the Designated Safeguarding team. All staff, directors and governors should be retrained annually through the use of the Twyford Trust training portal – Flick Learning;
- Ensure there is an awareness amongst the safeguarding team that a child may not be ready /know how to talk about abuse/neglect/exploitation they are suffering and that it is important to build trust.
- Ensure staff have an awareness that children who hear or experience the effects of abuse at home (even if they are not the victim) may also suffer a detrimental impact on their health.
- Understand that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is a good reason to do so, and that sharing of information will enhance the safeguarding of a child in a timely manner. It would be legitimate to share information without consent where: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; and, if to gain consent would place the child at risk.

- Be aware of the requirement for children to have an appropriate adult when in contact with Police officers who suspect them of an offence. PACE (Police And Criminal Evidence Act 1984) states that anyone who appears to be under 18, in the absence of clear evidence that they are older, shall be treated as a child. PACE also states that if at any time an officer has reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point. The DSL will communicate any vulnerabilities know by the school to any police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded on CPOMs. If having been informed of the vulnerabilities, the DSL (or deputy) does not feel the officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns. A person whom there are grounds to suspect of an offense must be cautioned before being questioned about an offence, or asked further questions if the suspect's answers or silence provide grounds for suspicion. A Police officer must not caution a juvenile or a vulnerable person unless the appropriate adult is present. If a child or vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence. The appropriate adult means, in the case of a child:
    - The parent, guardian or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation
    - A social worker of a local authority
    - Failing these, some other responsible adult aged 18 or over who is not: a) a police officer b) employed by the police c) under the direction or control of the chief officer of a police force or d) a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force) to assist that force in relation to the discharge of its chief officer's functions
    - Further information can be found here: https://www.gov.uk/government/publications/pace-code-c-2019
- See Appendix D for more information about this role.

Our Board of Directors and each Governing Body will ensure that:

- Each school has a nominated governor (or two) responsible for child protection who will undertake the Twyford Trust Annual Safeguarding Audit annually in conjunction with the school's DSL. This audit will include a detailed review of the Child Protection Policies and Procedures and all matters relating to CP. The findings from this audit are feedback to the School's GB and the Twyford Trust Directors.
- The Trust has a Child Protection Policy and procedures in place that are in accordance with local authority guidance and locally agreed inter-agency procedures, and the policy is made available to parents on request; this policy together with the staff code of conduct and the role of the designated safeguarding lead will be explained as part of staff induction. At least part 1 of 'Keeping Children safe in Education' September 2026 will be given to all staff – including temporary staff and volunteers – on induction.
- The school operates safe recruitment procedures (including making sure one person on each interview panel has had safer recruitment training) and makes sure that all appropriate checks are carried out on staff and volunteers who work with students. A training module in safer recruitment is included on the Twyford Trust's online learning portal Flick learning and key staff's completion of this is monitored
- The school has procedures for dealing with allegations of abuse against staff and volunteers that comply with guidance from the local authority and locally agreed inter-agency procedures.

- Provide pupils with open access to information about self-harm and details of who to go to for help and support
- A senior member of each school's leadership team is designated to take lead responsibility for safeguarding (and deputy). This person will have the appropriate authority and be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings – and/or to support other staff to do so – and to contribute to the assessment of children. The designated lead will liaise with the local authority and work with other agencies in line with *Working Together to Safeguard Children 2023 statutory guidance.* There will always be cover for this role (see Appendix D for description of role).
- One or more deputy safeguarding leads will be trained to the same standard as the designated safeguarding lead.
- All staff members undergo safeguarding and child protection training at induction in line with advice from the LSCP and that all staff receive regular child protection updates as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively
- They remedy, without delay, any deficiencies or weaknesses regarding child protection arrangements.
- They put in place appropriate safeguarding responses to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future.
- A governor of each school is nominated to be responsible for liaising with the LA and /or partner agencies in the event of allegations of abuse being made against the CEO, Headteacher or Associate Headteacher.
- Where services or activities are provided on a Trust school's premises by another body, the body concerned has appropriate policies and procedures in place in regard to safeguarding children and child protection and liaises with the school on these matters where appropriate.
- Other bodies providing services or activities on a Trust school's premises review their policies and procedures annually and provide information to the LA about them and about how the above duties have been discharged
- A designated teacher is appointed to promote the educational achievement of children who are looked after and to ensure that this person has appropriate training. This member of staff has the skills, knowledge and understanding necessary to keeping looked after children safe. In particular they should ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after them. The designated safeguarding lead, through the designated teacher for looked after children, should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.
- An annual review with SLT and the Twyford Trust Pastoral working group of the PSHE and RHSE curriculum, thus ensuring all aspects of CP are covered
- Ensure the school has a policy in respect of the use of restrictive interventions, including the use of reasonable force and which reflects that the adoption of a 'no contact' policy can leave staff unable to fully support and protect pupils

- Ensure the school has appropriate cyber security systems in place

- Filtering and monitoring effectiveness will be reviewed at least once every academic year by the SLT member responsible for filtering and monitoring, with the support of the DSL and IT support. Reviews will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record of these checks will be kept.
- Governors should receive training to ensure they test and assure themselves that safeguarding policies and procedures are in place
- Governing bodies should ensure their school has appropriate filters and monitoring systems in place and regularly review their effectiveness
- The school has appropriate filtering and monitoring systems in place and review their effectiveness
- The DfE's filtering and monitoring standards are reviewed, and discuss with IT staff and service providers what needs to be done to support the school to meet these standards
- The DSL takes lead responsibility for understanding the filtering and monitoring systems in place as part of their role
- All staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- All staff understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training

Our Executive Headteacher, Headteachers and Associate Headteachers for each school will ensure that:

- The policies and procedures adopted by the Board of Directors are fully implemented, and followed by all staff;
- Sufficient resources and time are allocated to enable the designated person and other staff to discharge their responsibilities; and
- All staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to students, and such concerns are addressed sensitively and effectively in a timely manner, using the Whistleblowing policy if necessary.
- Parents and pupils are aware of their roles and responsibilities when implementing policy where appropriate.
- All staff, including staff who do not work directly with children, will be expected to read Part one of KCSIE 2026. The Trust will ensure that Part one is provided at induction and that staff understand the school's child protection policy, behaviour policy, staff behaviour policy, attendance/absence safeguarding arrangements and the role of the DSL.
- The Twyford Trust safeguarding audit is successfully competed on an quarterly basis
- Copies of Keeping Children safe in Education part 1, the Staff Behaviour policy, the safeguarding response to children who are absent from education, the Child Protection policy and information regarding the role of the designated safeguarding lead are provided to staff on induction and reviewed in the annual CP training on Flick Learning
- Children are taught about safeguarding, including online, through teaching and learning opportunities, as part of a broad and balanced curriculum.
- There is a culture of safeguarding and with all staff, but especially the DSL considering whether the wider environmental factors present in a child's life – contextual safeguarding – are a threat to their safety or welfare.

- Understand that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is a good reason to do so, and that sharing of information will enhance the safeguarding of a child in a timely manner. It would be legitimate to share information without consent where: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; and, if to gain consent would place the child at risk.
- If an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, will follow the Trust safeguarding policies and procedures and inform the local authority designated officer (LADO), as we would with any safeguarding allegation
- Children who may be LGBTQ+ have a trusted adult who they can be open with
- Online safety training is included in staff safeguarding and child protection training

All Staff and Volunteers:

- Will fully comply with the schools' policies and procedures, particularly those relating to safeguarding
  - Behaviour policy
  - Online safety
  - Staff code of conduct
  - Procedures for dealing with allegations against staff
- Read and understand at least part 1 of the Department for Education's statutory safeguarding guidance Keeping Children Safe in Education (KCSIE) in full, and review this guidance at least annually
- Will receive appropriate safeguarding and child protection training which is regularly updated. In addition, all staff will receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- Will undertake all the required CP training via Flick Learning
- Will be aware of online safety which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Will be aware of that fact that children can be at risk of harm inside and outside their home, at school and online
- Will be aware of the fact that mental health can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
- Will provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns
- Will be aware that they have a legal duty to report an act of FGM to the police if this appears to have been carried out on a girl under 18.
- Will inform the designated person of any concerns through the efficient and effective use of CPOMS
- Will be aware that all staff may raise concerns directly with Local Authority Children's Social Care services and will be made aware of the process for making referrals and for statutory assessments especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessment.
- Will be aware of the process for community-based Family Help assessments

- Will be aware of the signs of different types of abuse, neglect, exploitation and modern slavery, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- Will be aware of the safeguarding issues that often overlap and can put children at risk of harm, including:
  - Drug taking and/or alcohol misuse
  - Unexplainable and/or persistent absences from education
  - Serious violence, criminal exploitation (including that linked to county lines), radicalisation
  - Consensual and non-consensual making or sharing of nudes or semi-nudes
- Inform the relevant Headteacher/Associate Headteacher of any safeguarding concerns about adults in the school, unless the concern is about the Associate Headteacher in which case it should be referred to the school's Chair of Governors
- Will be aware that they may be asked to support social workers to take decisions about individual children
- Will press for re-consideration if a child's situation does not appear to be improving
- Will receive training to support them in knowing what to do if a child tells them he/she is being abused or neglected. Staff will be supported to understand how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and local authority children's social care. Staff should never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child. The victim may ask the school not to tell anyone about the sexual violence or sexual harassment. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under UK GDPR that applies.
- When dealing with a pupil who is self-harming: Remain calm and non-judgemental at all times; Listen to students and do not dismiss a pupil's reasons for distress as invalid; Encourage openness and be reassuring that help is available; NEVER promise confidentiality; Try to enable pupils to feel in control by asking what they would like to happen and what help they feel they need; Report the matter to the designated key member of staff through CPOMS
- Need to be aware of things to watch out for which may indicate radicalisation and report concerns about possible radicalisation to the Designated Safeguarding Lead.
- Will be aware that children may experience prejudice-based harm including racism, faith-based prejudice and other forms of discrimination. These experiences may affect a child's welfare, wellbeing, mental health and ability to seek help
- Will be alert to the potential need for early help for a child who:
  - is disabled or has certain health conditions and has specific additional needs;
  - has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
  - has a mental health need
  - is a young carer
  - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or County Lines
  - is frequently missing/goes missing from education, care or from home

- has unexplainable and/or persistent absences from education
- is at risk of modern slavery, trafficking, sexual or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child
- is persistently absent from education, including persistent absences for part of the school day
- Has experienced multiple suspensions, is at risk of being permanently excluded from school , college and in alternative provision or a pupil referral unit.

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

4.2 Safeguarding Information for Students

We will ensure:

- That all students are aware of the members of staff trained in child protection issue in the respective schools;
- Share key safeguarding information in start of term assemblies
- That issues of safeguarding are covered within **PSHE and RHSE curriculum** to help students learn how to keep safe.
- Students will also be taught about emerging online safeguarding risks, including the responsible and safe use of generative AI, and will be reminded that making or sharing nudes or semi-nudes includes images or videos that are digitally altered or wholly generated by AI. The Trust will ensure that the curriculum and safeguarding arrangements reflect the school's mobile phone policy
- That students are advised that when talking to teachers or friends about their mental health issues including self- harm, they focus on the emotional reasons behind their distress; that they avoid talking about their injuries or describing the methods they use; that they never encourage anyone to try to self-harm. Students will be advised to talk to a teacher or staff member as soon as they feel under emotional distress or feel an urge to injure themselves.
- That students are made aware that teachers cannot keep their confidentiality when their safety is at risk. Teachers may contact the student's parent/guardian and/or professionals; if a student is worried that a friend may be self-harming, they should go to a teacher for support and guidance; if any student is concerned that a friend may be suicidal or has mentioned suicide, then they should alert a teacher straight away.

4.3 Safeguarding Information for Parents

- Our schools will ensure that we work in partnership with parents and present on CP at annual parent information evenings
- We are committed to working with parents. We will make parents aware of this policy and that they can view this policy on request
- We will work closely with parents if a child has mental health issues – it is crucial that parents work closely with the school and take an active role in deciding the best course of action for the child
- Information sharing will take account of the Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025. Data protection will not be treated as a barrier to appropriate safeguarding information sharing where this is necessary to protect a child.
- KCSIE 2026 requires safeguarding records to be clear, factual and to distinguish observed concerns, professional opinion and historic information. Records should include a clear summary of the concern, how it was followed up and resolved, actions taken, decisions reached, the rationale for decisions and the outcome. Child protection files should be transferred securely and separately from the main pupil file as soon as possible and, for in-year transfers, within 5 days. The exporting school should provide a structured summary of current concerns, relevant context and ongoing support needs.
- We ask that parents keep the school informed of any incidents outside school that they feel the school should know about

4.4 Record Keeping, Information Sharing and Confidentiality

The Trust recognises that it is essential to establish positive and effective working relationships with all other agencies who are partners in the Ealing Safeguarding Children Board and that there is a joint responsibility on all agencies to share information to ensure the safeguarding of all students.

- We will share information with the relevant agencies when there are concerns about a student's welfare and develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters including attendance at case conferences.
- Through efficient and effective use of CPOMS we will keep written records of concerns about students, discussions and decisions made and the reasons for those decisions
- We will ensure all records are kept securely; separate from the main student file
- We will notify social services if there is an unexplained absence of more than two days of a student who is on the child protection register (child protection plan).
- We will ensure that, where a student on the child protection register leaves the school, all information is transferred to the new school immediately and that the student's social worker is informed
- We will apply best practice in the disclosure, storage and transfer of personal and confidential information (see Data Protection and Confidentiality Policy).
- The safer recruitment process will also reflect KCSIE 2026 references to trainee teachers, the DfE "Check a teacher's record" service and the requirement to make any required DBS referrals in relation to volunteers as well as employees and other relevant workers.

- KCSIE 2026 reflects the removal of the previous supervision exemption from regulated activity. Schools must assess whether volunteers and other adults are undertaking regulated activity under the revised arrangements and apply the appropriate DBS checks. This includes relevant volunteers who teach, train, instruct or supervise children on more than 3 days in a month or overnight.
- Timely information-sharing is essential to effective safeguarding
- Arrangements should be in place setting out the processes and principles for sharing information within the school and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018, Data (Use and Access) Act 2025, and the UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests

If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

- There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children

The DSL should consider that:

- Parents or carers should normally be informed (unless this would put the victim at greater risk)
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information (including personal information), and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)
- Where a child leaves the school the DSL should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving
- Confidentiality is also addressed in this policy with respect to record-keeping and allegations of abuse against staff

4.5 Safer Recruitment and Selection

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education (KCSIE) 2026.

- We will ensure safe recruitment procedures are always followed. The Trust pays full regard to current DfE guidance on Safer Recruitment outlined in KCSIE 2026
- We will ensure safe recruitment procedures are always followed. The Trust pays full regard to current DfE guidance on Safer Recruitment outlined in KCSIE 2026
- We ensure that all appropriate measures are applied in relation to everyone who works in the school who is likely to be perceived by the students as a safe and trustworthy adult including e.g. volunteers and staff employed by contractors.
- We will ensure an enhanced DBS check with barred list information for contractors engaging in regulated activity
- We will ensure an enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
- Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and, where appropriate, undertaking List 99 and Criminal Records Bureau/Disclosure and Barring Service (enhanced DBS) checks.
- Shortlisted candidates will be informed that the school may carry out online checks as part of the due diligence process.
- As part of the shortlisting process, the school will consider carrying out an online search as part of their due diligence on the shortlisted candidates.
- In line with legal and regulatory requirements, the following will apply:
  - A DBS Enhanced Disclosure and barred list screening for those engaging in regulated activity, is obtained for **all** new appointments to our school's workforce through the Human Resources Team. Governors and directors will have a DBS check in line with regulations. Volunteers will be required to have the check appropriate to the needs of their work (see Appendix E for further guidance)
  - Never allow an unchecked volunteer to work in regulated activity, or leave them unsupervised
  - Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity

- For any existing volunteer who is considered to be engaging in a regulated activity from 1 September 2026:
- Obtain an enhanced DBS check with children's barred list information; or

Obtain a standalone barred list check where:

- we wish to allow the newly appointed staff or volunteer to undertake regulated activity prior to obtaining the enhanced DBS check certificate; or
- we have recently obtained an enhanced DBS check without children's barred list information, and there has been no break in service since that certificate was issued
- an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months prior to their appointment to the school

- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- The Twyford Trust's Human Resources Team maintains an up to date Single Central Register, in accordance with the latest KCSIE regulations, detailing the checks carried out on all staff and volunteers. All new appointments to our school workforce who have lived outside the UK will be subject to additional checks as appropriate.
- The Twyford Trust will ensure that supply/contract/contractor staff who are not escorted on school premises during times when pupils are on site, except for designated public events, have undergone the necessary checks by their employers and will be made aware of this policy and the requirements of the Visitors Policy and Managing Contractors Policy. Supply/contract/contractor staff who work regularly on the site must be recorded on the Single Central Register.
- The Twyford Trust will ensure that all relevant staff undertake the appropriate Safer Recruitment training either externally or internally (through Flick Learning)
- Identity checks must be carried out on all appointments to our school workforce before the appointment is made, in partnership with the LA.
- The school will report to the Independent Safeguarding Authority (ISA) within one month of leaving the school any person (whether employed, contracted, a volunteer or student) whose services are no longer used because he or she is considered unsuitable to work with children.
- The school will ensure that any deficiencies or weaknesses in Child Protection arrangements are remedied without delay.
- The school will ensure that parents have an understanding of the responsibility placed on the school and staff for child protection by setting out its obligations in the relevant communications

Existing staff and volunteers

In certain circumstances we will carry out all the relevant checks on existing staff or volunteers as if the individual was a new member of staff or a new volunteer. These circumstances are when:

- There are concerns about an existing member of staff's or the volunteer's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

This duty applies equally to paid staff and volunteers where they were engaged in regulated activity.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors, or request to see the certificate if the self-employed person has obtained their own check and ensure that it is at the level required by the school.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

Volunteers

We will:

- Never allow an unchecked volunteer to work in regulated activity, or leave them unsupervised
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- For any existing volunteer who is considered to be engaging in a regulated activity from 1 September 2026:
    - Obtain an enhanced DBS check with children's barred list information; or
    - Obtain a standalone barred list check where:
        - We wish to allow the volunteer to undertake regulated activity prior to obtaining the enhanced DBS check certificate; or
        - We have recently obtained an enhanced DBS check without children's barred list information, and there has been no break in service since that certificate was issued
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

5. Abuse, Neglect, Exploitation and Safeguarding issues

All school and college staff should be aware that abuse, neglect, exploitation and **safeguarding issues are rarely standalone events** and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another, therefore staff should always be vigilant and always raise any concerns with their designated safeguarding lead (or deputy).

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

All staff should be aware that **technology is a significant component in many safeguarding and wellbeing issues**. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of nude or semi-nude images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. Risks related to online safety also include disinformation, misinformation and conspiracy theories. Disinformation is the deliberate creation and spread of false or misleading content, such as fake news. Misinformation is the unintentional spread of this false or misleading content

5.1 Definitions of the 4 categories of Abuse

These definitions are based on those from KCSIE 2026

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children f all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse

DfE statutory guidance, "Keeping children safe in education", September 2026

There are 4 categories of abuse:

Physical Abuse

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

Emotional Abuse

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development.

- It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of explorations and learning or preventing the child participating in normal social interaction.
- It may involve seeing or hearing the ill-treatment of another.
- It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.
- It may involve verbal abuse such as criticism, belittling, or name-calling

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

- The activities may involve physical contact, including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.
- They may also include non-contact activities, such as involving children in looking at or in the production of, sexual images, watching sexual activities, encouraging children to

behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

The sexual abuse of children by other children is a specific safeguarding issue in education (see 5.2)

Neglect

Neglect involves the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health and development.

- Neglect may occur during pregnancy as a result of maternal substance abuse
- Once a child is born, neglect may involve a parent or carer failing to provide adequate food, shelter or clothing (including exclusion from home or abandonment), failure to protect from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment.
- It may also include neglect of or an unresponsiveness to a child's basic emotional needs.

5.2 Specific safeguarding issues

Children who are absent from education

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

The DfE's Working together to improve school attendance is statutory guidance and will be adhered to in all matters regarding children who are absent from education.

Alternative Provision

Where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs. The cohort of pupils in Alternative Provision often have complex needs, it is important that governing bodies and proprietors of these settings are aware of the additional risk of harm that their pupils may be vulnerable to.

Where a school places a pupil in alternative provision the school will:

- gain written confirmation from the alternative provider that appropriate staff safeguarding checks have been carried out, as well as written information about any arrangements that may put the child at risk
- have records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend
- regularly review any alternative provision placements to make sure the placement continues to be safe and meets the child's needs. If safeguarding concerns occur, the placement should be immediately reviewed and ended if necessary.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can be perpetrated by organised networks or gangs, and the victim may identify as part of this group.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (County Lines), forced to shoplift or pickpocket, or to threaten other young people. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. Most sexual abuse is committed by individuals known to the victim. It can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. Victims are not always recognised and can be criminalised for actions they take while under coercion.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being

abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Children who hear or experience the effects of abuse at home (even if they are not the victim) may have suffer a detrimental impact on their health.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

Police must notify a school of a domestic abuse incident where a child is involved, has witnessed or been present, lives at (or is linked to) the address where it occurred, or where a Child Concern Notification has been issued, regardless of whether the child was there at the time. The police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This notification should reflect the 'voice of the child' (for example, statements made the child or behaviour observed). This is the procedure set out in the statutory Operation Encompass guidance for information sharing.

The DSL will provide support according to the child's needs and update records about their circumstances.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called '**honour-based' abuse** (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. It is illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not used (this reflects a law change in February 2023).

Preventing radicalisation

- Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence.
- Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- 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 of terrorism 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.

Child-on-child abuse (including harassment and violence)

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Discriminatory behaviour (including racism, faith-targeted abuse and other prejudice-based incidents)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Physical assault and harm, or the threat of harm with a weapon
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Harmful sexual behaviour (an umbrella term widely used in child protection, and which applies to behaviour occurring online, face-to-face, or both), sexual violence and sexual harassment, which may include misogyny/misandry)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

- Consensual and non-consensual sharing of nudes and semi-nudes images, and/or videos (also known as sexting or youth produced sexual imagery) including those generated using AI
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of nude or semi-nude images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

Contextual Safeguarding - Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. All staff, but especially the designated safeguarding lead (and deputies) will consider the context within which such incidents and/or behaviours occur - i.e. Whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Local authority Children's social care assessments should consider such factors so it is important that staff provide as much information as possible as part of the referral process.

Creating a supportive environment in school and minimising the risk of child-on-child abuse. We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Ensure staff are trained to understand:
    - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
    - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
    - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:

- Children can show signs or act in ways they hope adults will notice and react to
- A friend may make a report
- A member of staff may overhear a conversation
- A child's behaviour might indicate that something is wrong

- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns

- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Recognise the intersection of misogyny/misandry and harmful sexual behaviour. We will actively identify, challenge and address how misogynistic/misandrist attitudes contribute to the normalisation of inappropriate behaviour and increases the risk of leading to child-on-child abuse, including sexual harassment and sexual violence, within our school environment
- Be alert to the prevalence of harmful online material and extreme misogynistic/misandrist ideologies, including misogynistic influencers, and recognise the impact this content could have on shaping pupils' attitudes
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment

Harmful Sexual behaviour, sexual violence and sexual harassment between children in schools

We will respond to all signs, reports and concerns of harmful sexual behaviour (HSB), child-on-child sexual harassment and sexual violence. This includes incidents occurring outside of the school premises, and/or online.

Sexual violence refers to specific sexual offences under the Sexual Offences Act 2003 involving:

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration, and A does not reasonably believe that B consents
- Assault by penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or

anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents

- Sexual assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents. Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault)
- Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party)

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity, and each time activity occurs. A child under the age of 13 can never consent to any sexual activity, the age of consent is 16, and sexual intercourse without consent is rape.

HSB can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them
- Recognising the intersection of misogyny/misandry and harmful sexual behaviour. It's important not to dismiss issues that may seem minor at first, such as derogatory language, as behaviours can escalate into more severe forms of child-on-child abuse

Filtering and Monitoring

The DSL in each school will take lead responsibility for safeguarding and online safety, which includes overseeing and acting on:

- filtering and monitoring reports
- safeguarding concerns
- checks to filtering and monitoring systems

The IT team will have technical responsibility for:

- maintaining filtering and monitoring systems
- providing filtering and monitoring reports
- completing actions following concerns or checks to systems

The IT team will work with the executive and senior leadership team and DSL to:

- identify risk
- carry out reviews
- carry out checks

Governing bodies and senior leadership will ensure that filtering and monitoring provision is reviewed as part of a wider online safety review, at least annually.

The review will be conducted by members of the senior leadership team, the designated safeguarding lead (DSL), and the IT service provider and involve the responsible governor. The results of the online safety review should be recorded for reference and made available to those entitled to inspect that information.

All staff will be aware of reporting mechanisms for safeguarding and technical concerns. They should report to the DSL using CPOMs if:

- they witness or suspect unsuitable material has been accessed
- they can access unsuitable material
- they are teaching topics which could create unusual activity on the filtering logs
- there is failure in the software or abuse of the system
- there are perceived unreasonable restrictions that affect teaching and learning or administrative tasks
- they notice abbreviations or misspellings that allow access to restricted material

Following a report of a concern, as above, the DSL or other appropriate member of the safeguarding team will act accordingly to address the concern. If necessary, the Child Protection team will work with the IT team to remove any risk of harm.

The school will have regard to the DfE guidance Generative AI: product safety expectations. This guidance on generative artificial intelligence (AI) explains how filtering and monitoring requirements apply to the use of generative AI in education and supports schools to use generative AI safely.

5.3 Signs and Symptoms of; Abuse and other safeguarding issues

The following signs may or may not be indicators that abuse has taken place, but the possibility should be considered. This is not an exclusive list. Guidance on recognising signs and symptoms of abuse can be found in Chapter 4 of London Child Protection Procedures. The indicators listed may run across several categories.

Physical Abuse

- Unexplained recurrent injuries or burns, bruising, bite marks, fractures or scars
- Inconsistent, multiple and/or improbable explanations for observed physical injury or refusal to explain injuries
- Unexplained delay in seeking treatment
- Parent/s carer/s are uninterested or undisturbed by an accident or injury
- Refusal to undress for PE
- Self-Destructive tendencies
- Aggression towards others
- Fear of Physical contact – Shrinking back if touched
- Admitting that they are punished, but the punishment seems excessive
- Fear of suspected abuser being contacted.

Emotional Abuse

- Physical, mental and emotional development lags
- Sudden speech disorders
- Continual self-depreciation ("I'm stupid, ugly, worthless, etc.")
- Overreaction to mistakes
- Extreme fear of any new situation
- Inappropriate response to pain ("I deserve this")
- Attention seeking behaviour
- Extremes of passivity or aggression

Sexual Abuse

- Being overly affectionate or knowledgeable in a sexual way inappropriate to the child's age
- Itchy or pain in the genital area
- Other extreme reactions, such as depression, self-mutilation, suicide attempts, running away, overdoses, anorexia
- Personality changes such as becoming insecure or clinging
- Being isolated or withdrawn
- Inability to concentrate
- Become worried about clothing being removed
- Suddenly drawing sexually explicit pictures
- Trying to be "ultra-good" or perfect; overreacting to criticism

Neglect

- Constant Hunger
- Poor personal hygiene
- Constant tiredness
- Poor state of clothing
- Emaciation
- Untreated medical problems
- No social relationships
- Compulsive scavenging
- Destructive tendencies

Children who are absent from education

There are many circumstances where a child may become absent from education, but some children are particularly at risk, it is important to look out for these. They include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

Child criminal exploitation

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing or who are absent from school or education
- Not taking part in education

Child sexual exploitation

Grooming and sexual exploitation can be very difficult to identify. Warning signs can easily be mistaken for 'normal' teenage behaviour and/or development. However, parents, carers, school teachers and practitioners are advised to be alert to the following signs and symptoms:

- Inappropriate sexual or sexualised behaviour
- Repeat sexually transmitted infections; in girls repeat pregnancy, abortions, miscarriage
- Having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- Going to hotels or other unusual locations to meet friends
- Getting in/out of different cars driven by unknown adults
- Going missing from home or care
- Having older boyfriends or girlfriends
- Associating with other young people involved in sexual exploitation
- Truancy, exclusion, disengagement with school, opting out of education altogether
- Unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- Drug or alcohol misuse
- Getting involved in crime
- Injuries from physical assault, physical restraint, sexual assault

Part 5 of KCSIE sets out the legal duties placed on schools on managing reports of child on-child sexual violence and harassment: "When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs

assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis." As always when concerned about the welfare of a child, the best interests of the child should come first. In all cases, Trust schools will follow general safeguarding principles as set out in KCSIE.

Trust schools are informed and guided by the NSPCC's recommended tool to gauge sexualised behaviour and distinguish developmentally typical sexual behaviour from sexual behaviours that are problematic or harmful. This is called 'Hackett's continuum' and identifies a range from 'normal' to 'inappropriate', 'problematic', 'abusive' and 'violent' (Hackett, 2010[1]). See attachment F in appendices.

Female Genital Mutilation

Potential signs that a pupil may be at risk of FGM include

- A girl or woman may have difficulty walking, sitting or standing.
- A girl or woman may spend longer than normal in the bathroom or toilet due to difficulties urinating.
- A girl may spend long periods of time away from a classroom during the day with bladder or menstrual problems.
- A girl or woman may have frequent urinary or menstrual problems.
- There may be prolonged or repeated absences from school or college.
- A prolonged absence from school or college with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return could be an indication that a girl has recently undergone FGM.
- A girl or woman may be particularly reluctant to undergo normal medical examinations.
- A girl or woman may confide in a professional.
- A girl or woman may ask for help, but may not be explicit about the problem due to embarrassment or fear

Preventing radicalisation

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.
Staff will be alert to changes in pupils' behaviour.
The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use

- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

It should be remembered that outside events such as tensions in the local community, events in the country of origin, in the case of migrants, or major world events (such as the Iraq war) can also disproportionately affect the feelings and actions of young people. All staff should be alert to these events and be ready to help young people understand them and put them into context.

Sexual violence and sexual harassment between children in school

Some groups are potentially more at risk. Evidence shows that girls, children with disabilities, and lesbian, gay, bisexual and transgender (LGBTQ+) children are at greater risk. Indicators may be similar to some of those given for serious violence as outline below.

Serious violence

Serious violence is a continuing safeguarding concern which may involve:

- Physical assault
- Carrying, threatening with or using weapons (often in the context of peer conflict or bullying)
- Criminal exploitation

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Having been frequently absent, suspended, spent time in alternative provision, or permanently excluded from school
- Having been involved in offending, such as theft or robbery

- Being male
- Having experienced child maltreatment
- Having used drugs or alcohol in early adolescence
- Having previously been a victim or previously perpetrated violence

Staff will be aware of these indicators and risk factors and will be alert to when children might be at highest risk around the school day (for example, immediately after school).

If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, including a child carrying or using a weapon (or expressing intent to do so), they will report this to the DSL.

The DSL will:

- Assess the risk to both the individual pupil and others in the school, consider wider information or concerns and take appropriate action
- Put in place a safety and support plan for the pupil (depending on the risk)
- Where relevant, consider action to de-escalate peer conflict

The Cass review

- Identified that caution is necessary for children questioning their gender as there are still unknowns around the impact of social transition, and that children 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)
- Recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children

School should take a cautious approach to supporting a gender questioning child and:

- Consider the broad range of the individual's needs
- Do this in partnership with their parents/carers (except in rare circumstances where involving parents/carers would bring a significant risk of harm to the child)
- Include any clinical advice that is available
- Consider how to address wider vulnerabilities, such as the risk of bullying

It is also important for staff to create a culture where pupils can speak out or share any concerns with staff.

Appendix A contains important additional information about specific forms of abuse and safeguarding issues

Children who are lesbian, gay, bisexual, or gender questioning

N.B. This section remains under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published. (see section 13 following KCSIE 2026 updates)

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

However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.

It recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.

As such, when supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. Schools should refer to our Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed.

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

6. How to Proceed

6.1 How to proceed with an Abuse Case

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue. Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)".

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

Make a referral to Local authority children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.** Tell the DSL as soon as possible if you make a referral directly.

If a child makes a disclosure to you

If a student asks to speak to you "in confidence", it is important for you to respond in the following way: "I am happy to listen to what you have to say but you must realise that if you tell me anything which makes me think you are not safe or are being harmed in some way, I will have to pass that on to a member of the Safeguarding team. (These would indicate all disclosures relating to child abuse, and staff are reminded that they cannot give specific advice on contraception- they can, however, give details of help lines or Family Planning Clinics etc.; (details always with the Heads of Year). Notes should be made of any interview, recording time, date, place and people present, as well as what was said.

In summary, if a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask 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. Stick to the facts, and do not put your own judgement on it

Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to Local authority children's social care and/or the police directly and tell the DSL 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

Staff should consider whether a child's mental health needs may indicate wider safeguarding concerns and ensure that safeguarding, welfare, attendance, engagement and educational outcomes are considered together. The DSL should liaise with the senior mental health lead and relevant services where appropriate.

It is essential that **ALL** staff employed by the Trust follow the reporting procedures outlined in Appendix B below (published to all staff). Disclosure cannot be negotiable. If abuse is reported or suspected, then action **MUST** be taken immediately. It is up to Social Services to make any final decision on anything which is reported to them.

- Impulsivity
- Drug or alcohol abuse
- Depression, suicide or self-harm in the family
- Family conflict (periods in Local authority care, parental separation)
- On-going family relationship problems
- Family circumstances (parental criminality / poverty / step children /single parents / more than 5 children in the family)
- Past or present physical or sexual abuse
- Unreasonable expectations
- Difficulty in making relationships/loneliness
- Bullying, including cyberbullying and homophobic bullying
- It is important to recognise that none of these risk factors may appear to be present. Sometimes it is the outwardly happy, high achieving person with a seemingly stable background who is suffering internally and hurting themselves in order to cope.

6.2 How to proceed with a Mental Health concern

All staff are made aware that mental health problems, in some case can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitations

a. Warning signs

Whilst there may be no warning signs, any change in the behaviour, attitudes or presence at school which is unlike the young person can be significant and should be followed up.
Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. If any member of the school staff becomes aware of warning signs which indicate a student is experiencing difficulties that may lead to thoughts of self-harm or suicide, they should always treat them seriously and refer to CPOMS. Possible warning signs include:

- Changes in eating / sleeping habits (e.g. student may appear overly tired if not sleeping well)
- Increased isolation from friends or family, becoming socially withdrawn
- Changes in activity and mood e.g. more aggressive or introverted than usual
- Lowering of academic achievement
- Talking or joking about self-harm or suicide
- Abusing drugs or alcohol
- Expressing feelings of failure, uselessness or loss of hope
- Changes in clothing

b. Intervention and response – Also see Appendix F for the Intervention Flowchart

Following the report, the designated teacher / governor will decide on the appropriate course of action. This may include:

- Contacting parents / carers
- Arranging professional assistance e.g. doctor, nurse, social services (see Appendix H for details of liaison with GPs).
- Arranging an appointment with a counsellor
- Immediately removing the student from lessons if their remaining in class is likely to cause further distress to themselves or their peers
- In the case of an acutely distressed student, the immediate safety of the student is paramount and an adult should remain with the student at all times
- If a student has self-harmed in school a first aider should be called for immediate help

c. Arrangements for monitoring and evaluation – also see Appendix G for Ongoing Support guidance

Any meetings with a student, their parents or their peers regarding self-harm will be recorded on CPOMS and will be stored in the student's child protection file.

6.3 How to proceed with an extremism concern

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.
If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.
The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.
In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

Further information is available from:

- British values in C of E Schools: http://schools.london.anglican.org/uploads/document/2_0_british-values-in-c-of-e-schools-dec-2014.docx
- DfE guidance: www.gov.uk/government/news/new-safeguarding-advice-for-schools-and-childcare-providers
- Channel guidance: www.gov.uk/government/publications/channel-guidance
- www.preventtragedies.co.uk
- www.familiesmatter.org.uk
- The DfE Counter Extremism confidential telephone helpline 020 7340 7624 (email counter.extremism@education.gsi.gov.uk).

6.4 How to proceed with a child-on-child abuse concern (including harassment and violence)
We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", or "boys being boys" as this can lead to a culture of unacceptable behaviours, misogyny/misandry and an unsafe environment for pupils.
For some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys' perpetrators. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence

- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

6.5 How to proceed with a concern involving making or sharing of nudes and semi nudes (including AI-generated intimate images)

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, (also known as 'sexting' or 'youth produced sexual imagery'), included where generated by AI, you must report it to the DSL immediately.

You must not

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting: Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)
- The DSL will make an immediate referral to police and/or children's social care if:
- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13

- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL: If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers: The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police: If it is necessary to refer an incident to the police, this will be done through contacting the school's safer officer, a police community support officer, local neighbour police or dialling 101 or if required 999

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in Appendix D of this policy also apply to recording these incidents.

6.6 How to proceed with a concern about a member of staff

If you have concerns about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) posing a risk of harm to children, speak to the Headteacher as soon as possible. If the concerns/allegations are about the Headteacher, speak to the chair of governors. The Headteacher/chair of governors will then follow the procedures set out in the allegations against staff policy, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) to the Headteacher, report it directly to the local authority designated officer (LADO).

Sharing low-level concerns

All low-level concerns should be reported to the DSL and Associate Head Teacher.

The Head Teacher will be the ultimate decision-maker in respect of all low-level concerns, although it is recognised that the Head Teacher may wish to consult with the DSL and take a more collaborative decision-making approach. If the school is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the hard threshold, the Head Teacher/DSL will consult with their LADO.

The term 'low-level concern' does not mean that it is insignificant. A low-level concern is any concern – no matter how small, even if it is no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside work
- Does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO. Examples of such behaviour could include but are not limited to:
  - *Being over-friendly with children*
  - *Having favourites*
  - *Taking photographs of children on their mobile phone, contrary to school policy*
  - *Engaging a child on a one-to-one basis in a secluded area or behind a closed door*
  - *Humiliating pupils*

Recording low-level concerns

Records will be kept and reviewed so that potential patterns of concerning, inappropriate, problematic or concerning behaviour can be identified. The school will follow safeguarding procedures and inform the LADO if there is an allegation of an incident happening while an individual or organisation is using the school premises to run activities for children.

See appendix J –for flow chart of 'response to a report of sexual violence' from a victim or a third party

7. Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.
Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.
In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

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

8. Pupils with special educational needs, disabilities or health issues

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges both online and offline. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration

- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse
- The need for intimate care or that these children are isolated from others
- That these children are more likely to be dependent on adults for care
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or being unable to understand the consequences of doing so

We offer extra pastoral support for these pupils. This includes an assigned key-worker/TA for those students with an EHCP, and additional check-ins from the Form Tutor, Assistant Head of Year or Head of Year

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO. The school consider extra pastoral support and attention for these children, and ensure any appropriate support for communication is in place.

9. Pupils with medical conditions

An incident relating to the management of a child's medical condition (including allergies) does not itself warrant a referral to local safeguarding partners.

A safeguarding referral will be made where an incident highlights concern that the child might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family because of their medical condition. For example, information about the child's medical condition might be withheld from the school, or the child may be repeatedly sent to school without essential medication, putting them at risk.

10. Young carers

The Trust recognises that caring responsibilities can impact on a child's attendance, attainment, behaviour and wellbeing, and early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health service.

11. Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

12. Looked-after and previously looked-after children

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

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

Each Trust school has appointed a designated teacher who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

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

As part of their role, the designated teacher will:

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

13.Pupils who are lesbian, gay or bisexual

The Trust recognises that a child being lesbian, gay, or bisexual is not in itself a risk factor for harm. However, pupils who are (or who are perceived by other children to be) lesbian, gay, or bisexual can sometimes be vulnerable to discriminatory bullying. See our behaviour policy for more detail on how we prevent bullying based on sexuality.

Any concerns should be reported to the DSL.

14.Pupils who are questioning their gender

14.1 Supporting pupils who are questioning their gender

We are aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, such as relating to relationships with family, peers or their broader social environment.

We will take a strong, proactive stance on all forms of bullying based on gender. See our behaviour policy for more detail. The school will ensure that children and their families are aware that, while the school will appropriately sanction any cases of bullying or harassment, and take a strong stand against bullying, it must also be conscious of the rights of pupils and staff in relation to their religion or belief,

When supporting a pupil questioning their gender, we will take into account the principle of taking a careful approach

The DSL will lead in these cases.

14.2 Involving parents/carers in cases of pupils questioning their gender

Where a child who is questioning their gender asks for support from the school, we will engage parents/carers as a matter of priority.

However, in the rare circumstances where involving parents/carers might put a pupil at greater risk than not involving them, the DSL will determine a course of action needed to safeguard the child before contacting parents/carers or any decisions are taken.

Where a child confides in a member of staff about their feelings but does not ask the school to make changes to how they are treated, the school will only break any confidence if there is a related safeguarding risk.

14.3 Considering requests for support with social transition

The school will not initiate any action regarding social transition. However, when a pupil or their parent/carer requests that the school makes changes or puts support in place to facilitate the pupil presenting as the opposite biological sex ("social transition"), we will work together with parents/carers to determine what is in the best interests of the child and other children.

Members of staff will not adopt any changes relating to social transition unless a decision has been made by the school and a child's parents/carers have been involved (as set out in Keeping Children Safe in Education (KCSIE)).

In making decisions about supporting social transition, the Trust will ensure compliance with its obligations in respect of safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by the Trust's evaluation of the welfare and best interests of the child and other children. The schools will make decisions in line with the following principles:

- The school has statutory duties to safeguard and promote the welfare of all children: the first step when considering a child's request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child's wishes
- Parents and carers should be actively involved and their views treated with importance: (except in the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them) where a child who is questioning their gender asks for support from the school parents/carers will

be engaged as a matter of priority and their views will carry great weight and be properly considered

- Accommodating social transition is an active intervention so the school will take a very careful approach: social transition is an active intervention that may have significant effects on the child in terms of their psychological functioning and longer-term outcomes
- The school will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition

The school will ensure that the decision-making process is documented and records are kept.

The circumstances or needs of a child may change over time, and the school may need to review its original decision and will involve the DSL in doing so.

14.4 Rules on single-sex spaces

Pupils are not allowed into toilets, changing rooms, showers or boarding/residential accommodation designated for the opposite biological sex, with no exceptions.

14.5 Rules on single-sex sports

The school may teach and play some sports or games, or activities of a competitive nature, in single-sex groups where the physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa). The school can separate children according to their biological sex in these circumstances.

Some sports may need to be played in single-sex groups from a certain age to ensure children's safety. Where single-sex sports are implemented for safety reasons, there are no exceptions and pupils must not be allowed to participate in sports designed for the opposite sex.

15. Links with Other Policies

This policy should be read in conjunction with:

- Sex and Relationships Policy
- Behaviour Policy
- Restraint Policy
- Anti-Bullying Policy
- Race Equality Policy
- Drugs Policy
- Whistleblowing Policy
- Data Protection and Confidentiality Policy
- Procedures for dealing with allegations against staff
- Staff code of conduct
- SEN Policy
- Health & Safety Policy
- First Aid Policy
- Online safety Policy

These policies are all available on COPIA here

Appendix A

This appendix contains information about the following specific forms of abuse and safeguarding issues. All staff are expected to be able to identify and recognise all forms of abuse, neglect, exploitation and modern slavery and shall be alert to the potential need for early help:

- Children and the court system
- Children who are absent from education
- Children with a parent or carer in custody, or is affected by parental offending
- Child sexual exploitation
- Child criminal exploitation: County Lines
- Domestic abuse
- Homelessness
- So-called 'honour based' violence
- FGM – statutory duty to report to police
- Forced marriage
- Preventing radicalism
- Peer on peer abuse
- Sexual violence and sexual harassment between children

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. There are two separate age-appropriate guides to support children 5-11-year olds and 12-17 year olds.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Children who are absent from education

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse, neglect or exploitation, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school's or college's unauthorised absence and children who are missing from education procedures.

Elective home education (EHE)

Many home educated children have a positive learning experience. We would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all. Elective home education can mean that some children are not in receipt of suitable

education and are less visible to the services that are there to keep them safe and supported in line with their needs.

In accordance with the School Attendance (Pupil Registration) (England) Regulations 2024, a school must make a return to the local authority when a pupil's name is deleted from the admission register.

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, we recommend that local authorities, schools, and other key professionals work together to coordinate a meeting with parents/carers where possible. This would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has special educational needs or a disability, and/or has a social worker, and/or is otherwise vulnerable. Where a child has an Education, Health and Care plan local authorities will need to review the plan, working closely with parents and carers.

DfE guidance for local authorities on Elective home education sets out the role and responsibilities of local authorities and their powers to engage with parents. Although this is primarily aimed at local authorities, schools should also be familiar with this guidance.

Children with family members in prison
Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

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

- Can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- Can still be abuse even if the sexual activity appears consensual;
- Can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- Can take place in person or via technology, or a combination of both;
- Can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- May occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);

- Can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- Is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Some of the following signs may be indicators of child sexual exploitation:

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

Child criminal exploitation: County Lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of County Lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in County Lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism98 should be considered. Like other forms of abuse and exploitation, County Lines exploitation:

- Can affect any child or young person (male or female) under the age of 18 years;
- Can affect any vulnerable adult over the age of 18 years;
- Can still be exploitation even if the activity appears consensual;
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- Can be perpetrated by individuals or groups, males or females, and young people or adults; and
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Domestic abuse

The cross-government definition of domestic violence and abuse is:
Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- Psychological;
- Physical;
- Sexual;
- Financial; and
- Emotional

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

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

- NSPCC UK domestic abuse Signs Symptoms Effects
- Refuge: what is domestic violence/effects of domestic violence on children
- Safelives: young people and domestic abuse
- Lucy Faithfull Foundation's 'Shore Space': offers a confidential chat service supporting young people concerned about their own or someone else's sexual thoughts and behaviours.

Homelessness
Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into Local authority children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: **Homeless Reduction Act Factsheets**. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/ or require accommodation.

So-called 'honour-based' violence
So-called 'honour-based' violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including

female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

Actions
If staff have a concern regarding a child that might be at risk of HBV or who has suffered from HBV, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and Local authority children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on **teachers** that requires a different approach (see following section).

FGM
FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

FGM mandatory reporting duty for teachers
Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: **Mandatory reporting of female genital mutilation procedural information**.

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. FGM Fact Sheet. 100 Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's or college's designated safeguarding lead (or deputy) and involve Local authority children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: FGM Fact sheet

Forced marriage
Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning

disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published statutory guidance and Multi-agency guidelines, with pages 35-36 of which focus on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email*: fmu@fco.gov.uk*.

Preventing radicalisation

Children are vulnerable to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

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

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

The Prevent duty

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

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). The guidance is set out in terms of four general themes: Risk assessment, working in partnership, staff training, and IT policies.

Additional support
The department has published advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts other sources of advice and support.

There is additional guidance: Prevent duty guidance: for further education institutions in England and Wales that applies to colleges.
Refer to the DfE's guidance on **managing risk of radicalisation in your education setting**
Educate Against Hate, a website launched by the Her Majesty's Government has been developed to support and equip school and college leaders, teachers, and parents with information, tools and resources (including on the promotion of fundamental British values) to help recognise and address extremism and radicalisation in young people. The platform provides information on and access to training resources for teachers, staff and school and college leaders, some of which are free such as Prevent e-learning, via the Prevent Training catalogue.

Channel
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. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: Channel guidance, and a Channel awareness e-learning programme is available for staff at: Channel General Awareness.

The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Channel referral. As a Channel partner, the school or college may be asked to attend a Channel panel to discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required.

Child on child abuse
Children can abuse other children. This is generally referred to as child on child abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.
Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.
Child-on-child abuse is most likely to include, but may not be limited to:

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

- Consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of nude or semi-nude images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

When staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 5 of this policy, as appropriate.

Sexual violence and sexual harassment between children in schools and colleges

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

Children who are victims of sexual violence and sexual harassment will likely experience stressful and distressing situations. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with disabilities and LGBTQ+ children are at greater risk. Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children with disabilities are also three times more likely to be abused than their peers

Staff should be aware of the importance of:

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- Not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
- Challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

What is Sexual violence and sexual harassment?

Sexual violence
It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003105 as described below:

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

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

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

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

Sexual harassment
When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.
Whilst not intended to be an exhaustive list, sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- Sexual "jokes" or taunting;
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
    - Non-consensual sharing of sexual images and videos;
    - Sexualised online bullying;
    - Unwanted sexual comments and messages, including, on social media; and
    - Sexual exploitation; coercion and threats

The response to a report of sexual violence or sexual harassment

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

If staff have a concern about a child or a child makes a report to them, they should follow the referral process as set out from paragraph 22 in Part one of KCSIE 2024. As is always the case, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy).

Appendix B

Twyford C of E Academies Trust is committed to Safeguarding and Promoting the Welfare of all of its students.

- This is defined as protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. *('Children' includes everyone under the age of 18).*
- The trust recognises that where a child is suffering significant harm, or is likely to do so, action should be taken to protect that child. Action should also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or are at immediate risk.
- Staff should always act in the best interests of the child and must ensure that the students' wishes and feelings into account when determining what action to take and what services to provide.

Key staff:

Twyford	**William Perkin**
Safeguarding Director Patrick Alleyne **Safeguarding Governor:** Anita Davies Luke **Designated Safeguarding Team:** Jamie MacDonald-Brown (DSL) Philip Bennett Amarpal Bajwa Tiff Easton Emma Johnston Laura Swadkin Lydia Holloway **Office Manager:** Emma O'Leary **Designated Officer for 'Looked After Children'** Jamie MacDonald Brown	**Safeguarding Governors:** Lolita George **Designated Safeguarding Team:** Bonny Campbell (Lead) Roy Owen (Deputy Lead) Stacie Long Catherine Lovell Reece Rake Beth Gandy Ceceliah Muyah Helen Gilmore Julie Hall Catherine Smith **Office Manager:** Victoria Stasic **Designated Officer for 'Looked After Children'** Ceceliah Muyah
Ealing Fields	**Ada Lovelace**
Safeguarding Governor: Ella Camplin **Designated Safeguarding Team:** Lucy Edwards (Lead) Emma Dunford-Jones (Deputy) Lucjan Santos James Salter Joel Coussins Lewis Townsend Dan Edwards	**Safeguarding Governor:** David Neno Paul Miller **Designated Safeguarding Team:** Hannah Marr (Lead) Ronnie Halton (Deputy Lead) Kate Brewer George Green George Stanton Hanna Khan

Jessica Knopp Monet Windsor **Office Manager:** Simon Croyden **Designated Officer for 'Looked After Children'** James Salter	Jessica Adler Michael Dusting Molly Powell Megan Bryant Ethan Fahy Eileen Docarragal Maxine Lang **Office Manager:** Jane Routledge **Designated Officer for 'Looked After Children'** Hannah Marr / Ronnie Halton

The above are the staff responsible for child protection/safeguarding issues. If you have any concerns about the safety and well-being of a student, you should make a referral through CPOMS:

Child protection

Rather than an individual member of the team.

Please give brief details of your concerns or an account of what happened.
As with all safeguarding concerns please remember that you cannot promise a child confidentiality when their safety is at stake. Please tell them that you will refer it to a member of the Safeguarding team. All our students have been made aware of the identities of the Safeguarding team and it is written in their planners.

One of the team will act as soon as they see it. **If you have not had a response within 2 hours**, please report to the school office to the appropriate office manager named above who will find one of the Child Protection team.

Please be aware that confidentiality is of major importance for students and their families where Child Protection is involved and this may mean that you do not receive feedback on the outcome of the referral. **However, if the child's situation does not appear to be improving, you should press for re-consideration.** You should also be aware that all staff may raise concerns directly with Local Authority Children's Social Care services.

Telephone number is: 020 8825 8000 option 2

Appendix C: Role of Designated Safeguarding Lead

Governing bodies, proprietors and management committees should ensure an appropriate **senior member** of staff, from the school or college **leadership team**, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take **lead responsibility** for safeguarding and child protection (including online safety). This should be explicit in the role holder's job description. This person should have the appropriate status and authority within the school to carry out the duties of the post. They should be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

Deputy designated safeguarding leads
Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description.
Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate **lead responsibility** for child protection, as set out above, remains with the designated safeguarding lead; this **lead responsibility** should not be delegated.

Managing referrals
The designated safeguarding lead is expected to:

- Undertake the Safeguarding Audit annually
- Refer cases of suspected abuse to the local authority children's social care as required;
- Support staff who make referrals to local authority children's social care;
- Refer cases to the Channel programme where there is a radicalisation concern as required;
- Support staff who make referrals to the Channel programme;
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- Refer cases where a crime may have been committed to the Police as required.
- Understand the additional online risks associated with generative AI and the particular online risks faced by children with SEND, including bullying, grooming and radicalisation, and ensure staff have appropriate up-to-date knowledge.

Work with others
The designated safeguarding lead is expected to:

- Act as a point of contact with the three safeguarding partners;
- Liaise with the Associate Headteacher or principal to inform them of issues especially ongoing enquiries under Section 47 of the Children Act 1989 and police investigations;
- As required, liaise with the "case manager" (as per Part four) and the designated officer(s) at the local authority for child protection concerns which concern a staff member);
- Liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and SENCOs or the named person with oversight for SEN in a college) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- Act as a source of support, advice and expertise for staff.

Training

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.

The designated safeguarding lead should undertake Prevent awareness training.

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

- Understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- Ensure each member of staff has access to and understands the school or college's child protection policy and procedures, especially new and part time staff;
- Are alert to the specific needs of children in need, those with special educational needs and young carers;
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation.
- In addition, see the DfE Data Protection guidance for schools, which will help school staff, governors and trustees understand how to comply with data protection law, develop their data policies and processes, know what staff and pupil data to keep and follow good practices for preventing personal data breaches.
- Understand the importance of information sharing, both within the school and college, and with the three safeguarding partners, other agencies, organisations and Practitioners.
- Are able to keep detailed, accurate, secure written records of concerns, discussions, decisions and referrals, including the rationale for those decisions. This should include instances where referrals were or were not make to another agency such as LA children's social care or the Prevent program.
- Understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- Can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- Obtain access to resources and attend any relevant or refresher training courses; and
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

- For Sept 2026 onwards, the Trust will use the current Working Together to Safeguard Children 2026 terminology and local arrangements for universal services, community-based early help and the targeted early help level of Family Help, while retaining any locally required Ealing processes and terminology.

Raising awareness

The designated safeguarding lead should:

- Ensure the school's child protection policies are known, understood and used appropriately to create a culture of safeguarding
- Ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this
- Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse of neglect may be made and the role of the school in this
- Link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

Child Protection file

Where children leave the school, the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible. it should be transferred separately from the main school file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

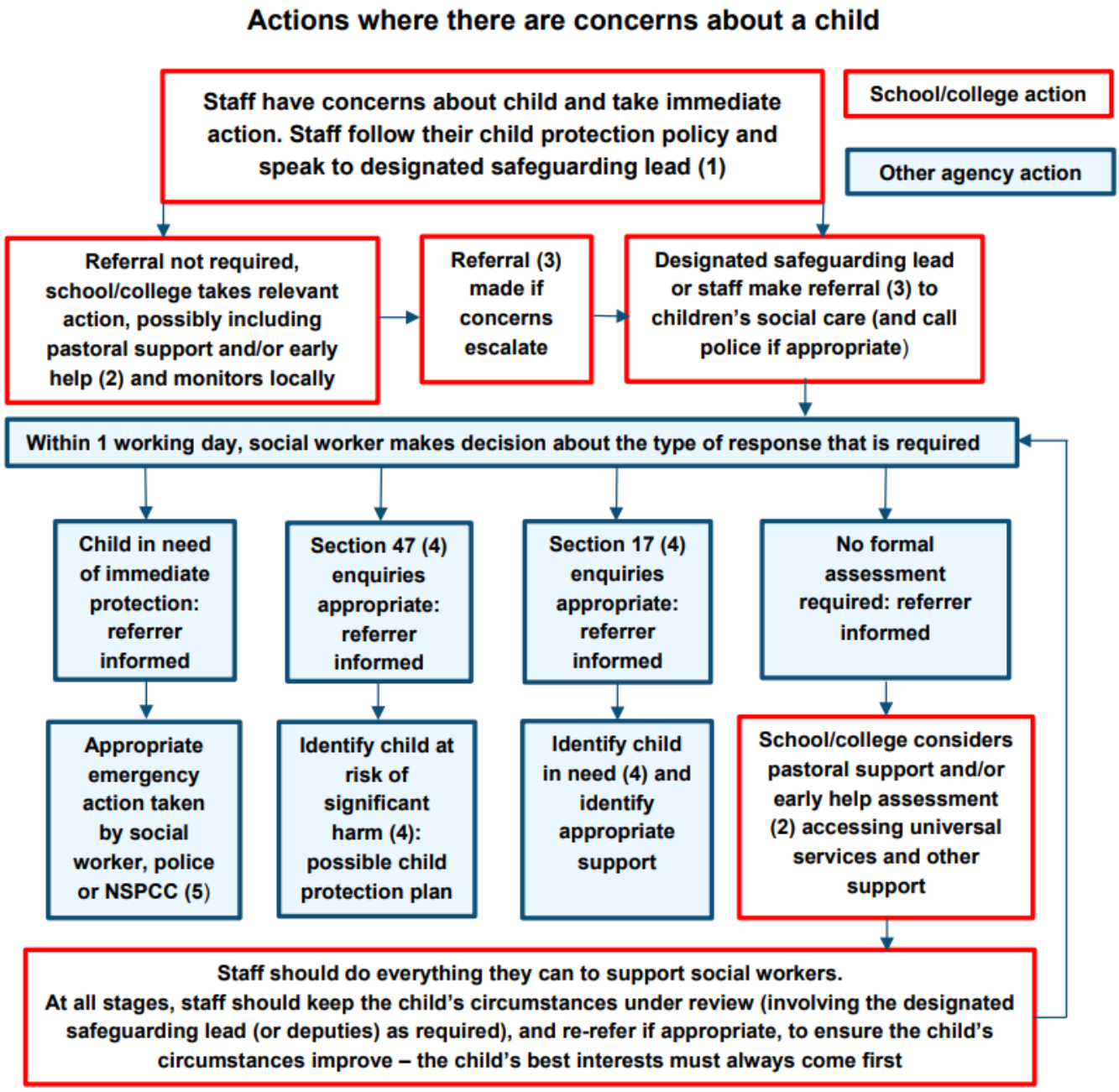
In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

Availability

During term time the designated safeguarding lead (or a deputy) should always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable.

It is a matter for individual schools and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

Appendix D: Actions when there are concerns about a child



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

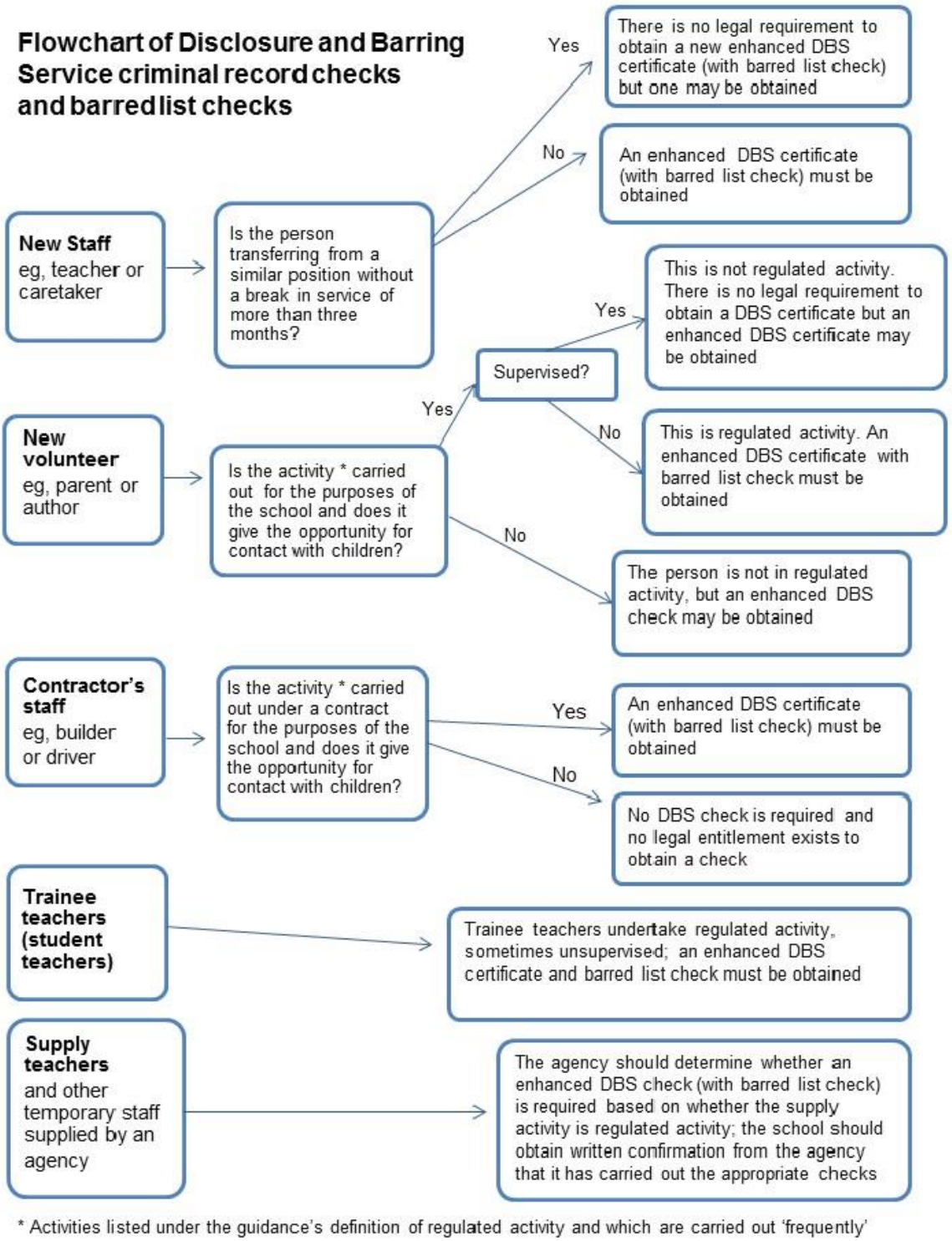
(2) Early help means providing support for children of all ages that improves a family's resilience and outcomes of reduces the chance or a problem getting worse. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working **together to safeguard children** 2023 statutory guidance - https://www.gov.uk/government/publications/working-together-to-safeguard-children--2 provides detailed guidance on the early help process.

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of **Working Together to Safeguard Children** - https://www.gov.uk/government/publications/working-together-to-safeguard-children--2

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of **Working Together to Safeguard Children -** https://www.gov.uk/government/publications/working-together-to-safeguard-children--2

(5) This could include applying for an Emergency Protection Order (EPO).

Appendix E: DBS flowchart



DISCLOSURE AND BARRING SERVICE CHECKS

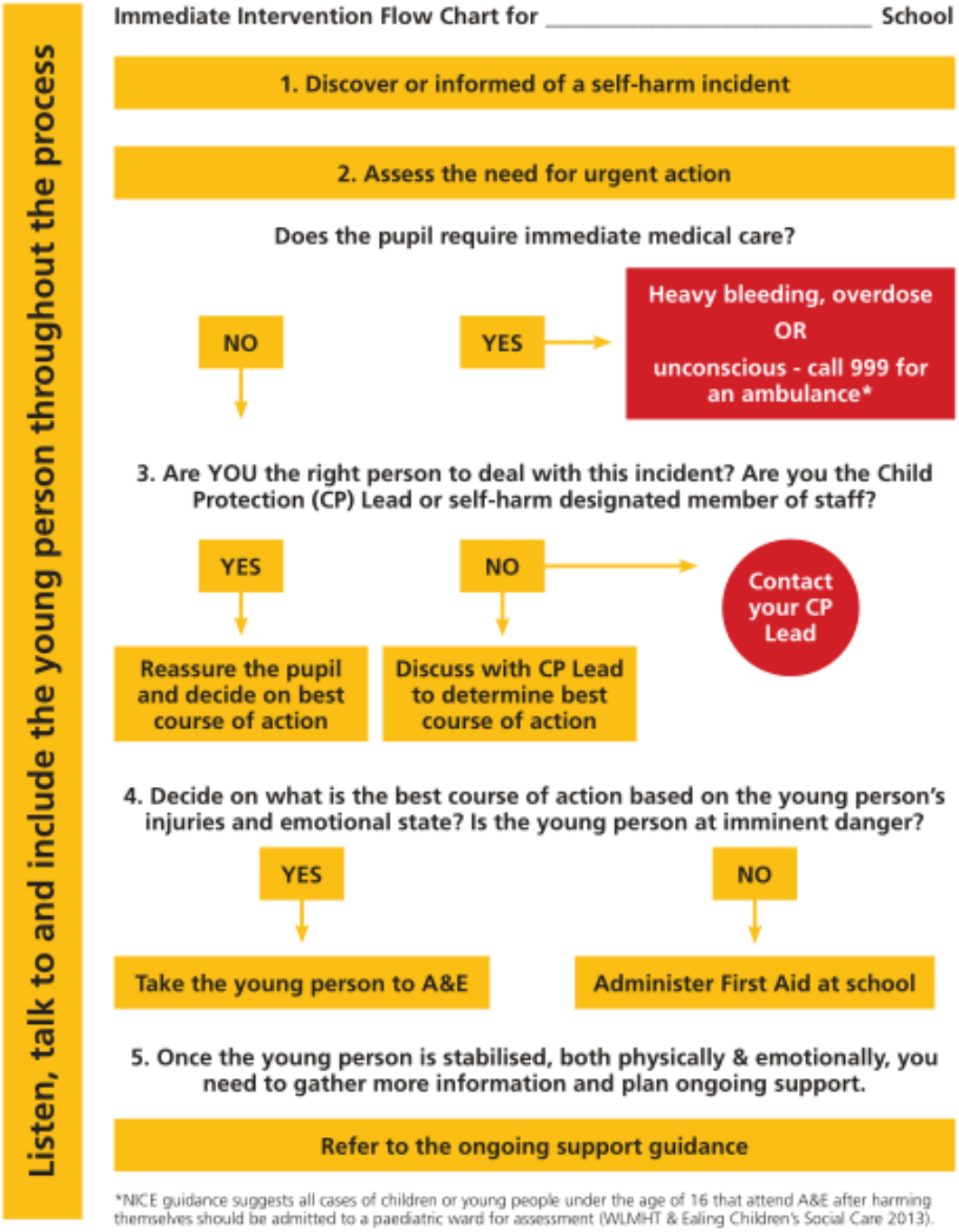
These are the types of checks available to those working with children:

Type of check	What the check involves	Positions eligible for this level of check
Standard check	Check of the Police National Computer records of convictions, cautions, reprimands and warnings.	The position being applied for must be covered by an exempted question in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975.
Enhanced check	Check of the Police National Computer records **plus** additional information held by police such as interviews and allegations. Additional information will only be disclosed where a chief police officer reasonably believes it to be relevant and considers that it ought to be disclosed.	The position being applied for must be covered by an exempted question in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 and by provisions in the Police Act 1997 (Criminal Records) Regulations 2002.*
Enhanced criminal record check with children's and/or adult's barred list information	Check of the Police National Computer records **plus** additional information held by police **plus** check of the DBS Children's Barred List **plus** check of the DBS Adults' Barred List.	The position must be eligible for an enhanced level criminal record check as above and be for a purpose listed in the Police Act 1997 (Criminal Records) (No2) Regulations 2009 as qualifying for a barred list(s) check.

*This legislation does not provide a list of job roles that are eligible for this check – such a list does not exist. Instead, the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 sets out the 'exempted questions' for which a standard check can be obtained. Similarly, the Police Act 1997 (Criminal Records) Regulations 2002 set out the purposes for which an enhanced check can be obtained, and the Police Act 1997 (Criminal Records) (No 2) Regulations 2009 list the circumstances in which an enhanced check will automatically include a barred list check. It is important to note that the Regulations can also remove roles, duties or activities through the removal of an exempted question or of a particular purpose. The Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975, the Police Act 1997 (Criminal Records) Regulations 2002 and the Police Act 1997 (Criminal Records) (No 2) Regulations 2009 can all be found on the legislation website - http://www.legislation.gov.uk/

Any individual (including an applicant for a job which does not involve working with children) can be asked to apply for a basic criminal record check. This will show only unspent convictions and cautions. This service is currently provided via the Disclosure and Barring Service. Further details can be found on gov.uk

Appendix F: – Self-Harm Immediate intervention flowchart for Twyford Trust schools



Appendix G: – Ongoing support guidance for CP lead to follow for Self-Harm Cases

It is important to assess the young person at regular intervals as things may change. It is good practice to keep a record of these meetings, and record any information you gather during discussions with the young person and their parents. If other professionals are invovled you may want to consider initiating an EHAP

To make certain the young person has the opportunity to talk and be taken seriously you may want to use the following series of questions to help you understand the episode and gather essential information to know how best to respond:

1. About the self-harm

What was used to self-harm?

When did it take place and where?

What time of day/night?

What did the young person do?

Who was around at the time?

Who did they tell?

What did they do?

2. Degree of intent and risk of further self-harm

Along the scale below, what communication was intended by the young person?



How long has the young person been thinking about harming themselves?

Was the act impulsive or part of a long standing plan?

What were they thinking at the time of the event?

Who know that they were feeling so bad? What would you have wanted them to do?

What did they expect to happen as a result of the event?

3. What other vulnerabilities affect the self-harming behaviour?

Trauma	family violence, child abuse, bullying
Life events	parent divorce, exams, bereavement
Cultural factors	identity, sexuality, language
Social support	friendship/relationship breakdown, isolation
Family	mental health of parents, domestic violence

4. Who knows about the young person's self-harming behaviour?

Who knows the pupil has/is self-harming?

How does the young person feel about this?

How have parents/carers been engaged?

What support has been provided to the young person and their parent/carer?

5. What services need to be involved?

Has a referral been made previously?

- School nurse – complete and submit a 'Teacher Concern' form
- GP (can make a CAMHS referral) – complete and send a 'Consent to share information' form to GP

You can use the 'GP and School Communication Cycle' (Appendix H) to guide discussions with the GP practice to ensure effective sharing of information between the parent, GP and school.

- ECIRS (Ealing Children's Integrated Response Service) - call this service anytime to refer an urgent or non-urgent self-harm incident. They will assess each case and refer accordingly

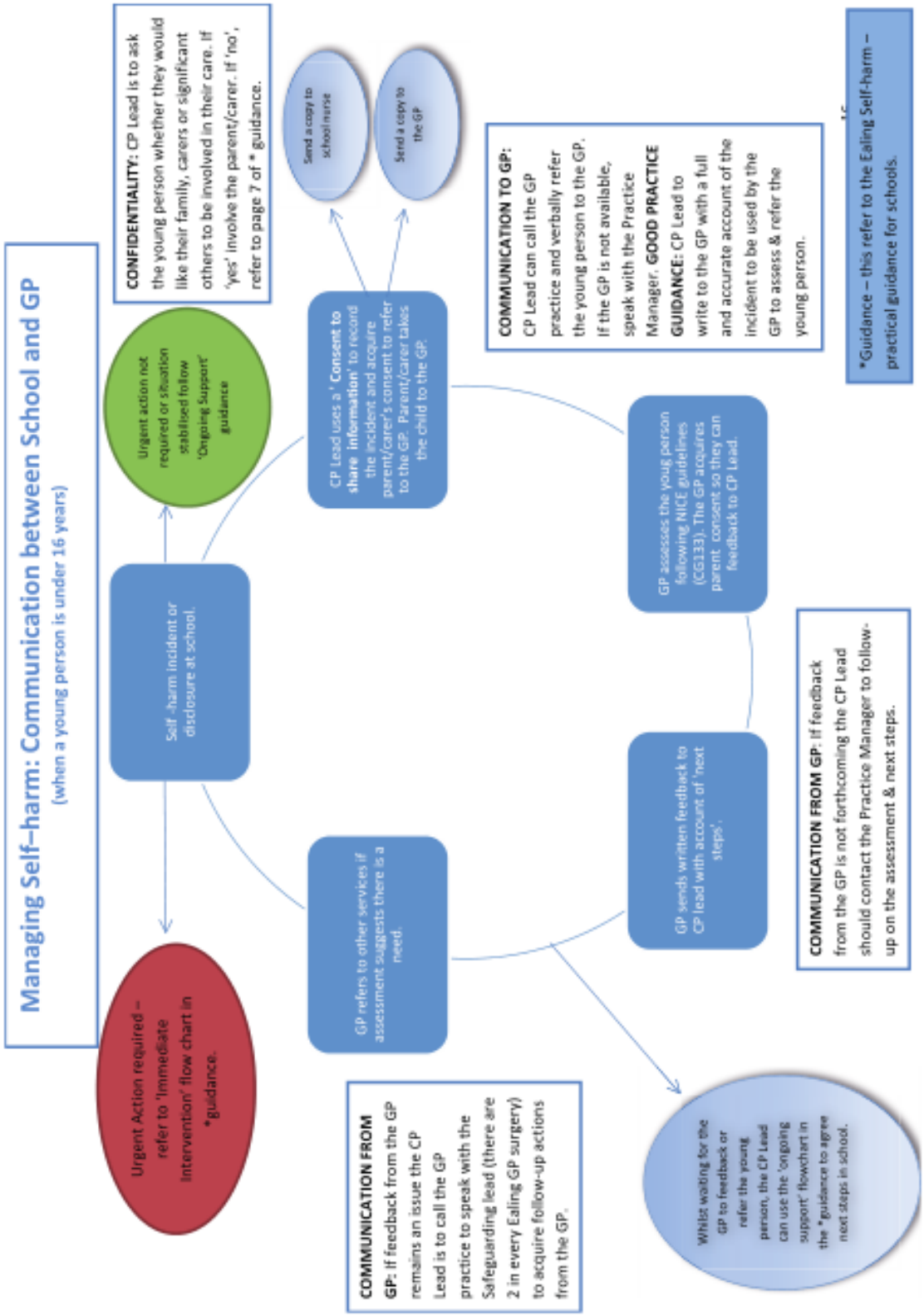
6. Reassess regularly

Is follow-up required?

- Follow up with the School Nurse and GP
- Review where on the 'GP and School Communication Cycle' you are, and what should be done next.

Appendix H- Managing self-harm: communication between School and GP

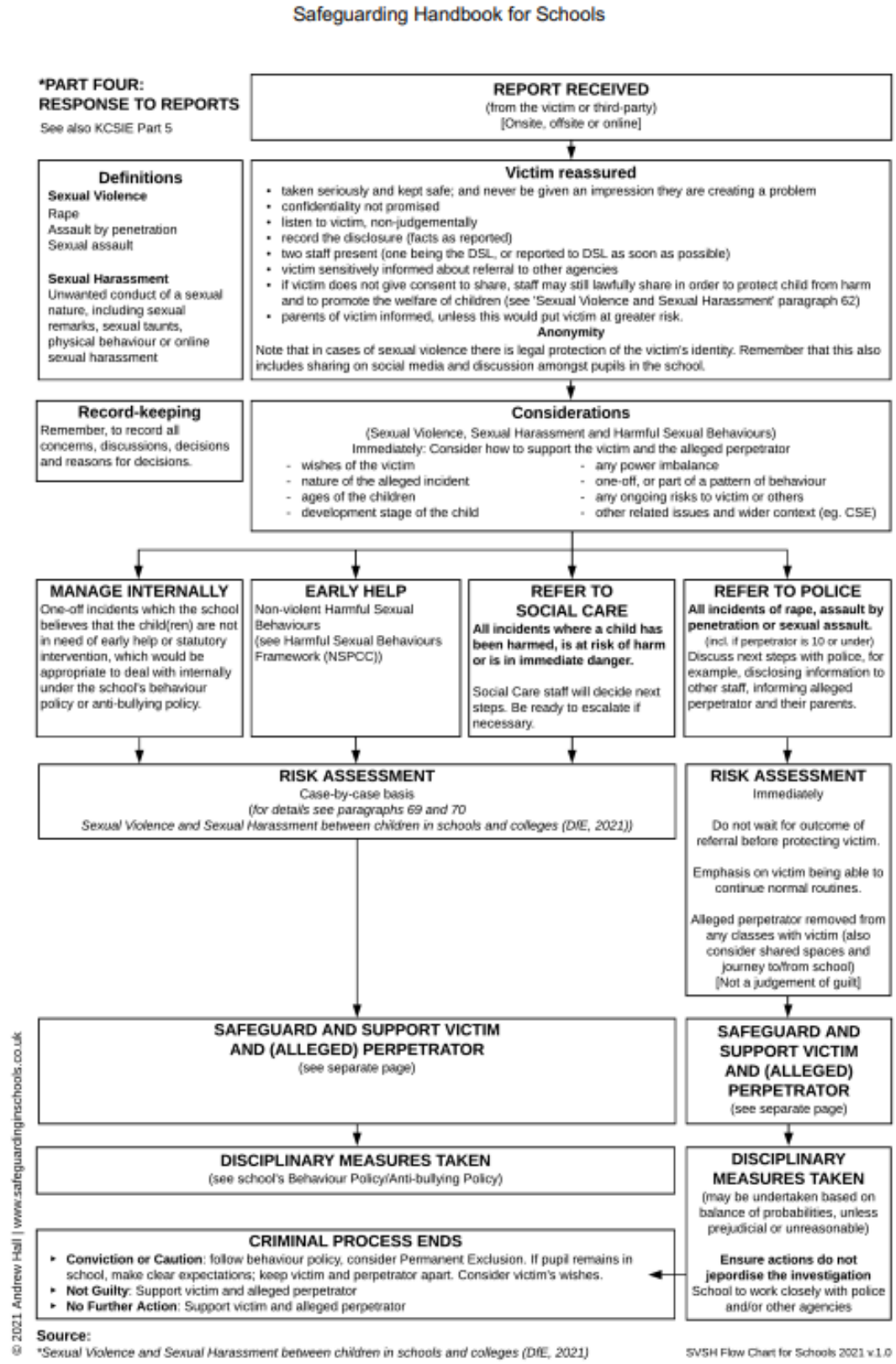
(When a young person is under 16 years)



Appendix I – Form for Reporting Concerns Regarding Radicalisation and Extremism

Pupil's Name	
Form Group	
Concern Reported By	
Details of Concern	
Action Taken	
Details of Referrals including Names and Contact Details	
Follow-up Action	
Signed by Designated Safeguarding Lead	Date
Signed by Headteacher	Date

Appendix J –response to a report of sexual violence



Appendix K– information for schools

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, information for schools and colleges can be found on the TES, MindEd and the NSPCC websites. School and college staff can access government guidance as required on the issues listed below via GOV.UK and other government websites:

- Bullying including cyberbullying
- Children who are missing from education – and Appendix A
- Child missing from home or care
- Child sexual exploitation (CSE) – and Appendix A
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM) – and Appendix A
- Forced marriage- and Appendix A
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Hate
- Mental health
- Missing children and adults
- Private fostering
- Preventing radicalisation – and Appendix A
- Relationship abuse
- Sexting
- Trafficking

Appendix A contains important additional information about specific forms of abuse and safeguarding issues. School leaders and those staff who work directly with children should read the Appendix.

Responding to children who display sexualised behaviour

It's important to be able to distinguish developmentally typical sexual behaviours from those that may be problematic or harmful, and make sure children get appropriate support. Always consider the child's holistic needs and safeguarding concerns alongside any sexualised behaviour and follow due procedures accordingly. This guide is a tool to support objective decision making about a child or young person's sexual behaviour and does not replace professional judgement or policy and legislation. Visit **nspcc.org.uk/hsb** for more information.

Need advice?

Contact our helpline for advice and support:

- Call **0808 800 5000**
- Email **help@nspcc.org.uk**
- Visit **nspcc.org.uk/helpline**

Childline

For children who need further support our free, confidential helpline is available 24/7:

- Call **0800 1111**
- Visit **childline.org.uk**

Developmentally typical	Problematic		Harmful	
Hackett Continuum				
Normal	**Inappropriate**	**Problematic**	**Abusive**	**Violent**
• Developmentally expected and socially acceptable behaviour • Consensual, mutual and reciprocal • Decision making is shared	• Single instances of developmentally inappropriate sexual behaviour • Behaviour that may be socially acceptable within a peer group but not in wider society • May involve an inappropriate context for behaviour that would otherwise be considered normal	• Developmentally unusual and socially unexpected behaviour • May be compulsive • Consent may be unclear and the behaviour may not be reciprocal • May involve an imbalance of power • Doesn't have an overt element of victimisation	• Intrusive behaviour • May involve a misuse of power • May have an element of victimisation • May use coercion and force • May include elements of expressive violence • Informed consent has not been given (or the victim was not able to consent freely)	• Physically violent sexual abuse • Highly intrusive • May involve instrumental violence which is physiologically and/or sexually arousing to the perpetrator • May involve sadism
How to respond • Although green behaviours are not concerning, they still require a response • Listen to what children and young people have to say and respond calmly and non-judgementally • Talk to parents about developmentally typical sexualised behaviours • Explain how parents can positively reinforce messages about appropriate sexual behaviour and act to keep their children safe from abuse • Signpost helpful resources like our 'Talk PANTS' activity pack: nspcc.org.uk/pants • Make sure young people know how to behave responsibly and safely	**How to respond** • Amber behaviours should not be ignored • Listen to what children and young people have to say and respond calmly and non-judgementally • Consider the child's developmental age as well as their chronological age, alongside wider holistic needs and safeguarding concerns about the problematic sexualised behaviour • Follow your organisation's child protection procedures and make a report to the person responsible for child protection • Your policy or procedure should guide you towards a nominated child protection lead who can be notified and will provide support • Consider whether the child or young person needs therapeutic support and make referrals as appropriate		**How to respond** • Red behaviours indicate a need for immediate intervention and action • If a child is in immediate danger, call the police on 999 • Follow your organisation's child protection procedures and make a report to the person responsible for child protection • Your policy or procedure should guide you towards a nominated child protection lead who should be notified and will provide support • Typically referrals to children's social care and the police would be required. Referrals to therapeutic services should only be made once statutory services have been informed and followed due procedures	

NSPCC Learning

In partnership with Durham University

NHS Supported by Health Education England

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